



July 9, 2004

**VIA CERTIFIED MAIL**

**RUTGERS Organics Corporation**

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**Re: JUNE 2004 MONTHLY REPORT  
RI/FS & REMOVAL ACTION  
NEASE CHEMICAL SITE  
SALEM, OHIO**

In accordance with Paragraph X E of the Administrative Order by Consent regarding a Remedial Investigation/Feasibility Study (RI/FS) of the Nease Chemical Site in Salem, Ohio, attached is a copy of the June 2004 RI/FS Progress Report.

Additionally, in accordance with Paragraph 14 of the Administrative Order by Consent, signed November 17, 1993, attached is a copy of the June 2004 Removal Action Progress Report.

Please contact us if you have any questions regarding activities discussed in these reports.

Sincerely,

A handwritten signature in cursive script that reads "Rainer Domalski".

Dr. Rainer F. Domalski  
Manager Remediation Projects

Enclosure

cc: M. Hardy – Thompson Hine  
Steve Finn – Golder Associates, Inc.

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**NEASE CHEMICAL SITE, SALEM, OHIO  
REMEDIAL INVESTIGATION/FEASIBILITY STUDY  
MONTHLY PROGRESS REPORT  
JUNE 2004**

**1.0 INTRODUCTION**

This progress report has been prepared in accordance with Paragraph XE of the Administrative Order of Consent regarding a Remedial Investigation/Feasibility Study of the Nease Chemical Site in Salem, Ohio. The report summarizes the major RI/FS actions during the month along with investigation results and any problems encountered in the project. Activities planned for next month are also presented.

**2.0 SUMMARY OF ACTIVITIES PERFORMED**

**2.1 Project Activity Summary**

The activities that were initiated and/or completed during the month are described. All activities were performed in accordance with the detailed protocol provided in the approved Work Plan.

**2.2 Fieldwork**

No fieldwork occurred during this month.

**2.3 Reports**

**2.3.1 Remedial Investigation - Endangerment Assessment (EA)**

Based on 2002 comments from the agencies, a revised Endangerment Assessment was submitted in April (Chapter I through VIII; Health) and June 2003 (Chapter IX and X; Ecological). It is currently under agencies' final review. On February 9, 2004, OEPA submitted its comments regarding the ecological assessment. USEPA Region V submitted its comments in March 16, 2004. ROC submitted the draft final EA on April 26, 2004.

On March 18, 2003, the agencies and ROC had a meeting regarding the upcoming Feasibility Study (FS). The parties discussed site conceptual model, proposed operational units (OU 1- 4), remedial actions objectives and technology screening (OU-2). A follow-up meeting was held on October 15, 2003. ROC presented the results from July 2003 groundwater sampling round and its meaning for the site remediation. The parties also discussed the Remedial Action Objectives and the remedial alternatives to be evaluated in the final document. US EPA Region V submitted its comments on March 16, 2004. OEPA's comments were received on May 6, 2004. The comments were discussed in a conference call; a response incl. a time schedule for the preparation of a draft FS was summarized in letter dated May 26, 2004. The draft FS (OU-2) needs to be submitted by August 26, 2004.

**2.4 Meetings**

No meeting was held during this month.

**3.0 VARIATIONS FROM THE APPROVED RI/FS WORK PLAN**

No variations from the approved Work Plans occurred during the month.

**4.0 RESULTS OF SAMPLING, TESTS AND ANALYSES**

No sampling was conducted during this month.

## **5.0 PROJECT SCHEDULE**

The attached updated Work Plan schedule identifies completion and target dates for project activities. Those scheduled to occur over the next several months include:

- Prepare Feasibility Study (OU-2; groundwater and soil)

## **6.0 DIFFICULTIES ENCOUNTERED AND ACTION TAKEN TO RESOLVE PROBLEMS**

No significant difficulties were encountered.

## **7.0 PERSONNEL CHANGES**

No personnel changes occurred during month.

## **8.0 ANTICIPATED PROJECT ACTIVITIES FOR JULY 2004**

- Monthly Progress Report June 2004
- Prepare Feasibility Study (OU-2)

Table 1  
Nease Chemical Site, Salem, Ohio  
RI/FS Schedule

| Date                 | Task/Activity/Deliverable/Milestone                                   |
|----------------------|---|
| February 22, 1988    | Effective Date of RI/FS Administrative Order of Consent               |
| April 5, 1991        | Partial Salem RI submitted to Agencies                                |
| July 6, 1993         | Salem RI submitted to Agencies  |
| July 29-30, 1993     | Source sampling event, ROC/Golder and Agencies/B&V WST                |
| August 10, 1993      | Submit monthly progress report  |
| September 10, 1993   | Submit monthly progress report  |
| October 10, 1993     | Submit monthly progress report  |
| November 10, 1993    | Submit monthly progress report  |
| Nov./Dec., 1993      | Egypt Swamp Sampling Event  |
| December 10, 1993    | Submit monthly progress report  |
| January 10, 1994     | Submit monthly progress report  |
| February 10, 1994    | Submit monthly progress report  |
| March 10, 1994       | Submit monthly progress report  |
| March 30, 1994       | Submit Supplemental Production Well Closure Plan to Agencies          |
| April 10, 1994       | Submit monthly progress report  |
| May 10, 1994         | Submit monthly progress report  |
| June 10, 1994        | Submit monthly progress report  |
| July 10, 1994        | Submit monthly progress report  |
| August 10, 1994      | Submit monthly progress report  |
| August 18, 1994      | Submit to Agencies Additional RI Report: MFLBC                        |
| August 22, 1994      | Receipt of US EPA Draft Comments on 1993 Salem RI Report              |
| September 6, 1994    | Receipt of US EPA Comments on 1993 Salem RI Report                    |
| September 10, 1994   | Submit monthly progress report  |
| September 23, 1994   | Receipt of USEPA Comments on Well Closure Plan                        |
| October 7, 1994      | Submit Supplemental Production Well Closure Plan (Revision #1)        |
| October 10, 1994     | Submit monthly progress report  |
| November 8, 1994     | Receipt of USEPA approval of Well Closure Plan (Revision #1)          |
| November 10, 1994    | Submit monthly progress report  |
| December 10, 1994    | Submit monthly progress report  |
| December 13-19, 1994 | Production Well Closure Field Work                                    |
| January 10, 1995     | Submit monthly progress report  |
| February 10, 1995    | Submit monthly progress report  |
| February 27, 1995    | Receipt of USEPA Comments to Additional Remedial Investigation Report |
| March 10, 1995       | Submit monthly progress report  |
| March 30, 1995       | Revised MFLBC Sampling Plan submitted                                 |
| April 10, 1995       | Submit monthly progress report  |
| April 25, 1995       | Meet to finalize MFLBC Sampling Plan                                  |
| May 10, 1995         | Submit monthly progress report  |

| <b>Date</b>           | <b>Task/Activity/Deliverable/Milestone</b>   |
|-----------------------|--|
| June 6, 1995          | Propose groundwater sampling Round 3   |
| June 10, 1995         | Submit monthly progress report   |
| June 30, 1995         | Receive agency comments to groundwater sampling Round 3 proposal   |
| July 5, 1995          | Receive agency approval of MFLBC Sampling Plan   |
| July 6, 1995          | Submit revised Round 3 groundwater sampling proposal   |
| July 10, 1995         | Submit monthly progress report   |
| August 1, 1995        | Receive Agency approval for CAL MPK analysis   |
| August 4, 1995        | Submit Rt. 14/Feeder Creek Plan to Agencies  |
| August 10, 1995       | Submit monthly progress report   |
| September 5-15, 1995  | Anticipated MFLBC phase III Sample Collection  |
| September 10, 1995    | Submit monthly progress report   |
| September 12, 1995    | Receive agency comments on Rt. 14/Feeder Creek Sampling Plan   |
| September 18-30, 1995 | Round 3 Groundwater Collection   |
| October 6, 1995       | Submit revised Rt. 14/Feeder Creek Sampling Plan   |
| October 25, 1995      | Resubmit revised Rt. 14/Feeder Creek Sampling (Verbal Comments)  |
| October 30-           | Collect Rt. 14/Feeder Creek Samples  |
| November 2, 1995      |  |
| November 10, 1995     | Submit monthly progress report   |
| December 10, 1995     | Submit monthly progress report   |
| December 28, 1995     | Receive Agency comments to Remedial Investigation Report   |
| January 10, 1996      | Submit monthly progress report   |
| January 31, 1996      | Submit Revised RI Report Volumes 1, 1A, 3 and 4  |
| February 10, 1996     | Submit monthly progress report   |
| March 10, 1996        | Submit monthly progress report   |
| April 10, 1996        | Submit monthly progress report   |
| April 24, 1996        | Meeting with agencies to discuss project status and submittal dates  |
| May 10, 1996          | Submit monthly progress report   |
| May 24, 1996          | Submit Appendix N  |
| June 10, 1996         | Submit monthly progress report   |
| June 14, 1996         | Submit Round 3 Groundwater Sampling Data   |
| June 19, 1996         | Revised RI Approved by EPA/OEPA  |
| July 10, 1996         | Submit monthly progress report   |
| August 10, 1996       | Submit monthly progress report   |
| September 6, 1996     | Submit monthly progress report   |
| September 11, 1996    | Meeting with Agencies to discuss Endangerment Assessment Comments  |
| October 10, 1996      | Submit monthly progress report, Submit revised Rt. 14/FC Investigation Results, Submit revised Eastern Plume/DNAPL Work Plan |
| November 10, 1996     | Submit monthly progress report   |
| December 10, 1996     | Submit monthly progress report   |
| December, 1996        | Complete Fieldwork E. Plume/DNAPL Workplan   |
| January 10, 1997      | Submit monthly progress report   |
| January 23, 1997      | Piezometer (hydropunch) sampling conducted   |
| February 7, 1997      | Submit monthly progress report   |

| Date               | Task/Activity/Deliverable/Milestone  |
|--------------------|--|
| March 7, 1997      | Submit monthly progress report   |
| March 25, 1997     | Receive agency comments on E. Plume/DNAPL Workplan   |
| April 10, 1997     | Submit monthly progress report   |
| May 9, 1997        | Submit monthly progress report   |
| June 9, 1997       | Submit monthly progress report   |
| June 30, 1997      | Receive Agency comments on Appendix N, RI  |
| July 8, 1997       | Submit monthly progress report   |
| July 18, 1997      | Submit revision package for Appendix N addressing agency comments  |
| August 8, 1997     | Submit DNAPL/Eastern Plume Report and Monthly progress report  |
| August 20, 1997    | Agency approval of Appendix N  |
| September 10, 1997 | Submit monthly progress report   |
| October 10, 1997   | Submit monthly progress report   |
| November 10, 1997  | Submit monthly progress report   |
| December 10, 1997  | Submit monthly progress report   |
| December 18, 1997  | Receive (12/19/97) agency comments to previously submitted EA chapters   |
| December 18, 1997  | Receive (12/29/97) USEPA Comments to Eastern Plume/DNAPL report  |
| December 29, 1997  | Receive (12/31/97) OEPA Comments to Eastern Plume/DNAPL report   |
| January 8, 1998    | Clarifications to agency EA comments requested by ROC letter   |
| January 9, 1998    | Submit monthly progress report   |
| January 13, 1998   | Telephone conference to obtain clarification on agency EA comments (human health)                                      |
| January 22, 1998   | Meeting in US EPA's Chicago offices to discuss Eastern Plume/DNAPL report comments                                     |
| January 28, 1998   | Telephone conference to obtain clarifications on agency EA comments  |
| January 29, 1998   | Telephone conference to obtain clarifications on agency EA comments (Ecological and revision schedule)                 |
| February 3, 1998   | ROC letter regarding summary of previous EA clarification telephone calls  |
| February 10, 1998  | Submit monthly progress report   |
| February 12, 1998  | Meeting in Twinsburg, OH to discuss agency comment to EA chapters and approach for finalization of remaining chapters. |
| March 10, 1998     | Submit monthly progress report   |
| April 1, 1998      | Receiver USEPA comments to revised Eastern Plume/DNAPL report  |
| April 8, 1998      | Submit monthly progress report   |
| April 15, 1998     | Submit Complete EA   |
| May 7, 1998        | Submit monthly progress report   |
| June 9, 1998       | Submit monthly progress report   |
| July 10, 1998      | Submit monthly progress report   |
| August 5, 1998     | Revised Eastern Plume/DNAPL report submitted   |
| August 7, 1998     | Submit monthly progress report   |
| August 14, 1998    | Receive draft agency comments on EA  |
| August 26, 1998    | Meeting in Twinsburg, Ohio to discuss EA comments  |
| September 10, 1998 | Submit monthly progress report   |
| October 8, 1998    | Meeting to discuss EA technical issues (EPA office, Chicago)   |
| October 9, 1998    | Submit monthly progress report   |

| Date               | Task/Activity/Deliverable/Milestone  |
|--------------------|--|
| November 6, 1998   | Teleconference on EA comments  |
| November 10, 1998  | Submit monthly progress report   |
| November 30, 1998  | Receive additional agency comments on EA                                   |
| December 10, 1998  | Submit monthly progress report   |
| December 15, 1998  | Teleconference on EA comments  |
| January 6, 1999    | Teleconference on EA comments (remaining item information status)          |
| January 8, 1999    | Submit monthly progress report   |
| January 22, 1999   | Submit EA Appendices   |
| February 3, 1999   | Agency MFLBC Sampling Letter received                                      |
| February 9, 1999   | Receive partial agency comments to EA/Appendices                           |
| February 10, 1999  | Submit monthly progress report   |
| February 23, 1999  | ROC responds to MFLBC Sampling proposal                                    |
| March 9, 1999      | Submit monthly progress report   |
| March 16, 1999     | Receive additional agency comments to EA/Appendices, more anticipated      |
| April 8, 1999      | Receive final agency comments to EA/Appendices                             |
| April 9, 1999      | Submit monthly progress report   |
| May 10, 1999       | Submit monthly progress report   |
| May 17, 1999       | Agency response letter to ROC MFLBC sampling proposal received             |
| June 7, 1999       | Conference call to resolve details on MFLBC sampling program and locations |
| June 9, 1999       | Submit monthly progress report   |
| June 18, 1999      | Submit revised EA  |
| July 9, 1999       | Submit monthly progress report   |
| July 12-21, 1999   | Conduct additional MFLBC field sampling work                               |
| July 28, 1999      | ROC proposal for Residential well sampling program via a conference call   |
| August 8, 1999     | Submit monthly progress report   |
| September 1, 1999  | Agency approval of residential well sampling program via a conference call |
| September 10, 1999 | Submit monthly progress report   |
| October 8, 1999    | Submit monthly progress report   |
| November 8, 1999   | Submit monthly progress report   |
| December 9, 1999   | Submit monthly progress report   |
| January 10, 2000   | Submit monthly progress report   |
| January 11, 2000   | Conduct Residential Well Sampling Program                                  |
| February 10, 2000  | Submit monthly progress report   |
| March 8, 2000      | Submit monthly progress report   |
| March 31, 2000     | Submit MFLBC Data Summary Report   |
| April 4, 2000      | Submit monthly progress report   |
| May 10, 2000       | Submit monthly progress report   |
| June 7, 2000       | Submit Residential Well Sampling Results                                   |
| June 8, 2000       | Submit monthly progress report   |
| July 7, 2000       | Submit monthly progress report   |
| July 31, 2000      | Received agency comment letter regarding draft Endangerment                |

| Date               | Task/Activity/Deliverable/Milestone   |
|--------------------|---|
| August 8, 2000     | Assessment<br>Submit monthly progress report                                      |
| September 8, 2000  | Submit monthly progress report  |
| October 4, 2000    | Submit monthly progress report  |
| October 11, 2000   | Agencies/ROC meeting regarding agency's comments to draft Endangerment Assessment |
| November 3, 2000   | Submit monthly progress report  |
| November 14, 2000  | Submit parts of the revised Endangerment Assessment (Chapter 1 – 4, 9)            |
| December 8, 2000   | Submit monthly progress report  |
| December 12, 2000  | Submit parts of the revised Endangerment Assessment (Chapter 10)                  |
| January 4, 2001    | Submit monthly progress report  |
| February 6, 2001   | Submit monthly progress report  |
| March 8, 2001      | Submit monthly progress report  |
| April 9, 2001      | Submit monthly progress report  |
| April 11, 2001     | Received agencies' comments regarding Appendix I                                  |
| May 8, 2001        | Submit monthly progress report  |
| May 18, 2001       | Received agencies' comments regarding Appendix I                                  |
| June 6, 2001       | Submit monthly progress report  |
| July 6, 2001       | Submit monthly progress report  |
| August 7, 2001     | Submit monthly progress report  |
| August 20, 2001    | Received agencies' comments regarding indoor air                                  |
| September 7, 2001  | Received agencies' comments regarding dermal exposure                             |
| September 10, 2001 | Submit monthly progress report  |
| September 18, 2001 | Initial response to agencies' September 7, 2001 letter                            |
| October 5, 2001    | Submit Monthly progress report  |
| October 19, 2001   | Received agencies' comment letter regarding EA issues                             |
| November 2, 2001   | Response to agencies' comments October 19, 2001                                   |
| November 7, 2001   | Submit monthly progress report  |
| December 7, 2001   | Submit monthly progress report  |
| December 28, 2001  | Submit draft final Endangerment Assessment (Human Health)                         |
| January 9, 2002    | Submit monthly progress report  |
| January 25, 2002   | Submit revised EA Chapters VI and VIII  |
| February 8, 2002   | Submit monthly progress report  |
| March 5, 2002      | Submit monthly progress report  |
| April 5, 2002      | Submit monthly progress report  |
| May 8, 2002        | Submit monthly progress report  |
| June 5, 2002       | Submit monthly progress report  |
| July 8, 2002       | Submit monthly progress report  |
| August 9, 2002     | Submit monthly progress report  |
| August 26, 2002    | EPA submit comments regarding ecological part of EA                               |
| September 10, 2002 | Submit monthly progress report  |
| October 10, 2002   | Submit monthly progress report  |
| October 30, 2002   | Submit Draft Endangerment Assessment (Human Health Part)                          |
| November 6, 2002   | Submit monthly progress report  |
| December 3, 2002   | Meeting with the agencies regarding the ecological part of the EA                 |
| December 10, 2002  | Submit monthly progress report  |
| December 30, 2002  | Agency comment letter regarding EA  |
| January 9, 2003    | Submit progress report  |
| February 5, 2003   | Submit monthly progress report  |
| March 18, 2003     | Meeting between agencies and ROC regarding FS                                     |
| March 19, 2003     | Submit monthly progress report  |



| Date              | Task/Activity/Deliverable/Milestone                        |
|-------------------|--|
| April 7, 2003     | Submit monthly progress report                             |
| April 25, 2003    | Submit revised EA Chapter I – VIII (Human Health)          |
| May 7, 2003       | Submit monthly progress report                             |
| June 10, 2003     | Submit monthly progress report                             |
| June 23, 2003     | Submit revised EA Chapter IX and X (Ecology)               |
| July 8, 2003      | Submit monthly progress report                             |
| July 21, 2003     | Start groundwater sampling (36 MW, sandbank)               |
| August 8, 2003    | Submit monthly progress report                             |
| September 5, 2003 | Submit monthly progress report                             |
| October 8, 2003   | Submit monthly progress report                             |
| October 15, 2003  | Meeting between agencies and ROC (FS groundwater and soil) |
| October 10, 2003  | Submit monthly progress report                             |
| November 10, 2003 | Submit monthly progress report                             |
| December 8, 2003  | Submit monthly progress report                             |
| January 9, 2004   | Submit monthly progress report                             |
| February 6, 2004  | Submit monthly progress report                             |
| February 9, 2004  | OEPA comments regarding ecological assessment              |
| March 15, 2004    | Submit monthly progress report                             |
| March 16, 2004    | US EPA Region V comments regarding EA and FS (OU-2)        |
| April 7, 2004     | Submit monthly progress report                             |
| April 26, 2004    | Submit draft final EA                                      |
| May 6, 2004       | OEPA comments regarding FS (OU-2)                          |
| May 7, 2004       | Submit monthly progress report                             |
| June 7, 2004      | Submit monthly progress report                             |
| July 9, 2004      | Submit monthly progress report                             |

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**NEASE CHEMICAL SITE, SALEM, OHIO  
REMOVAL ACTION  
MONTHLY PROGRESS REPORT  
JUNE 2004**

**1.0 INTRODUCTION**

This progress report has been prepared in accordance with Paragraph 14 of the "Order" section of the Administrative Order by Consent (AOC) Docket No. V-W-94-C-212, effective November 17, 1993, regarding a Removal Action at the Nease Chemical Site in Salem, Ohio. The report summarizes the major activities during the month along with investigation results and any problems encountered on the project. Activities planned for next month are also presented.

**2.0 SUMMARY OF ACTIVITIES PERFORMED**

**2.1 Project Activity**

The activities that were initiated and/or completed during this month are described below. Activities were performed in accordance with the Removal Action AOC.

OEPA, Northeast District Office conducted a compliance evaluation inspection of the Salem Site on April 30 and May 26, 2004. A follow-up letter from OEPA was submitted on June 28, 2004. ROC is currently working on required corrective actions and will response to OEPA's letter by July 30, 2004.

**2.2 Work Plan Preparation/Reports**

No work plans/reports were submitted this period.

**2.3 Fieldwork**

**2.3.1 Site Inspections**

The results of the monthly site inspection carried out at the site in June 30, 2004 are shown in Attachment 1.

**2.3.2 Monthly Water Level Measurements**

The next water level measurements are planned for August 2004.

**2.3.3 Treatment Plant Operation**

The treatment plant operated mostly normal throughout the month (see Chapter 6).

**2.4.1.1 Meetings**

No meeting occurred during this month.

**3.0 VARIATIONS FROM THE APPROVED REMOVAL ACTION WORK PLAN**

There were no variations from the approved Removal Action Work Plan for the month.

#### **4.0 RESULTS OF INSPECTIONS, ENVIRONMENTAL SAMPLING, TESTS AND ANALYSES**

Water monitoring samples were collected from the treatment plant during May/June 2004. Attachment 2 and 3 include results from water and air samples collected on April 20, 2004 and May 4, 2004 (Lab: Exygen Research). The mid-June sampling results were not available at the time reporting. It will be included in the next monthly report. Also attached is the quarterly results of two acute toxicity evaluations conducted from May 18 through May 22, 2004 by American Aquatic Testing Inc. (Attachment 4).

#### **5.0 PROJECT SCHEDULE**

The updated Work Plan schedule identifies completion and target dates for project activities.

#### **6.0 DIFFICULTIES ENCOUNTERED AND ACTION TAKEN TO RESOLVE PROBLEMS**

On June 14, 2004, ROC informed OEPA that the influent tank of the onsite groundwater system had overflowed. The water level switch in the tank, which normally shuts down the pump of the leachate collection system at a certain water level reached in the tank, was not functioning because of iron precipitation. The water recovered from the collection system discharged to the floor inside the treatment plant building. Some portion of this water also discharged to the ground outside the building. There was no indication that water reached any drainage ditch. The discharge area is inside the capture zone of the groundwater collection system. Infiltrated water is expected to be recovered.

ROC promptly informed Joe Trocchio, OEPA site manager from the NE District Office and the Spill Hotline. A written notification was submitted to OEPA on June 15, 2004. Water on the floor was vacuumed up.

The switch was immediately cleaned and is properly functioning since. In the short-term, the treatment will only be operated when personnel is onsite and can physically control the system. Golder, ROC's technical consultant, is currently reviewing different improvement options (i.e., additional high level alarm if high level switch does not shut down pump; containment around the influent tank, automatic startup of transfer pump, more frequent inspection of the level switches in the tank system). ROC will soon submit a proposal to the agencies for review and approval.

#### **7.0 PERSONNEL CHANGES**

No changes occurred during this month.

#### **8.0 TYPES AND QUANTITIES OF REMOVED MATERIALS**

For the period from May 1 through May 31, 2004 the following material was removed:

- 15,000 gallons of leachate and/or backwash water were disposed off-site at a licensed treatment facility.
- Approximately 239,700 gallons were pumped from Leachate Collection System 1 (LCS-1) (total for LCS-1 = 16,490,396 gal).
- Approximately 13,494 gallons were pumped from Leachate Collection System 2 (LCS-2) (total for LCS-2 = 1,133,405 gal).
- 5,493 gallons of water were pumped from Pond 1 (total for the pond = 886,600 gallons).

- Approximately 23 pounds of organic compounds were removed during pumping (estimate based on average VOC/SVOC concentrations for each source).

## **9.0 ANTICIPATED PROJECT ACTIVITIES FOR JULY 2004**

Removal Action activities scheduled for the upcoming month include on-going implementation of the approved Removal Action Work Plan involving:

- Collection of groundwater from the existing collection systems LCS-1, LCS-2 and Pond 1.
- Monthly Progress Report

Table 1  
Nease Chemical Site, Salem, Ohio  
Removal Action Schedule

| Date               | Task/Activity/Deliverable/Milestone   |
|--------------------|---|
| November 17, 1993  | Removal AOC Effective Date  |
| November 17, 1993  | Commence Preparation of Removal Action Work Plan  |
| November 23, 1993  | Submit Treatment Plant Performance Evaluation Work Plan (Rev. #1)   |
| November 28, 1993  | USEPA Conditional Approval of TPPEWP  |
| December 1, 1993   | Commence Treatment Plant Performance Evaluation   |
| December 9, 1993   | Complete Treatment Plant Performance Evaluation   |
| December 10, 1993  | Submit monthly progress report  |
| December 17, 1993  | Submit Removal Action Work Plan (Rev #0) to USEPA   |
| January 3, 1994    | USEPA Approval of TPPEWP (Rev #1)   |
| January 10, 1994   | Submit monthly progress report  |
| January 15, 1994   | Complete Treatment Plant Data Analysis and Evaluation   |
| January 17, 1994   | Notify EPA of inability of Treatment Plant to meet proposed discharge criteria. Commence preparation of Treatment Plant Modifications Work Plan (TPMWP) |
| January 24, 1994   | USEPA disapproval of Removal Action Work Plan (Rev. #0) and associated comments   |
| February 4, 1994   | Submit Revised Removal Action Work Plan (Rev #1) and Response to Agency comments  |
| February 10, 1994  | Submit monthly progress report  |
| February 11, 1994  | Submit Treatment Plant Performance Evaluation Report (TPPER)  |
| March 2, 1994      | Submit Treatment Plant Modifications Work Plan (TPMWP, Rev. #0)   |
| March 10, 1994     | Submit monthly progress report  |
| April 10, 1994     | Submit monthly progress report  |
| April 13, 1994     | Submit Revised Removal Action Work Plan (Rev #2) and Response to Agency comments  |
| April 20, 1994     | Submit Revised TPMWP (Rev #1) and Response to Agency comments   |
| May 10, 1994       | Submit monthly progress report  |
| May 13, 1994       | Submit Updates (Rev #3) to Removal Action Work Plan (Rev #2) and Response to Agency comments  |
| May 25, 1994       | USEPA approval of Revised RA Work Plan (Rev #2). Commence work on Work Plan implementation  |
| May 25, 1994       | Commence Preparation of Removal Action WP Addendum  |
| June 1, 1994       | Receipt of USEPA approval of Revised RA Work Plan (Rev #3)  |
| June 10, 1994      | Submit monthly progress report  |
| June 24, 1994      | Submit TPMWP (Rev #2)   |
| July 10, 1994      | Submit monthly progress report  |
| July 26, 1994      | Submit Treatment Plant Modifications Design Technical Memorandum (TPMDTM, Rev #0)   |
| July 28, 1994      | Receipt of USEPA approval of TPMWP (Rev #2 with revised Table 4)  |
| August 10, 1994    | Submit monthly progress report  |
| August 30, 1994    | Submit Removal Action Work Plan Addendum (RAWPA)  |
| September 10, 1994 | Submit monthly progress report  |

| Date                             | Task/Activity/Deliverable/Milestone                                       |
|----------------------------------|---|
| September 23, 1994               | Receipt of USEPA Comments or TPMDTM                                       |
| October 3, 1994                  | Submit TPMDTM (Rev #1)  |
| October 4, 1994                  | Submit TPMDTM (Rev #1)  |
| October 10, 1994                 | Submit monthly progress report  |
| November 9, 1994                 | Submit TPMDM (Rev #2)   |
| November 10, 1994                | Submit monthly progress report  |
| December 1, 1994                 | Receipt of USEPA approval of TPMDTM (Rev #2)                              |
| December 10, 1994                | Submit monthly progress report  |
| December 12-19, 1994             | RAWPA Extraction Well and Piezometer Installation                         |
| January 10, 1995                 | Submit monthly progress report  |
| January/February/<br>March, 1995 | Construction of TPMWP/TPMDTM measures                                     |
| February 10, 1995                | Submit monthly progress report  |
| March 10, 1995                   | Submit monthly progress report  |
| March 13-16, 1995                | Performance of Field Pumping Tests (E4 and S7)                            |
| April 10, 1995                   | Submit monthly progress report  |
| April 24, 1995                   | Submit status report on RAWPA, Task 5                                     |
| May 4, 1995                      | Start on-site treatment plant   |
| May 10, 1995                     | Submit monthly progress report  |
| June 10, 1995                    | Submit monthly progress report  |
| July 10, 1995                    | Submit monthly progress report  |
| July 21, 1995                    | Submit treatment plant 1 <sup>st</sup> month operation summary report     |
| July 26, 1995                    | Submit Cone penetrometer testing report and additional investigation plan |
| August 10, 1995                  | Submit monthly progress report  |
| September 10, 1995               | Submit monthly progress report  |
| October 10, 1995                 | Submit monthly progress report  |
| November 10, 1995                | Submit monthly progress report  |
| December 10, 1995                | Submit monthly progress report  |
| January 8-12, 1996               | Conduct 2 <sup>nd</sup> Round of cone penetrometer testing on site        |
| January 10, 1996                 | Submit monthly progress report  |
| February 10, 1996                | Submit monthly progress report  |
| March 10, 1996                   | Submit monthly progress report  |
| April 10, 1996                   | Submit monthly progress report  |
| April 18, 1996                   | Discontinue Outfall Discharge   |
| April 24, 1996                   | Agency Meeting – Discuss CPT results and future action plan               |
| May 10, 1996                     | Submit monthly progress report  |
| May 23, 1996                     | Submit 1996 IRM Seep Investigation and Fabric Barrier Work Plan           |
| June 10, 1996                    | Submit monthly progress report  |
| July 8-12, 1996                  | Install Piezometers and modify fabric barriers                            |
| July 10, 1996                    | Submit monthly progress report  |
| August 6, 1996                   | Submit monthly progress report  |
| September 10, 1996               | Submit monthly progress report  |
| October 10, 1996                 | Submit monthly progress report  |

| Date               | Task/Activity/Deliverable/Milestone               |
|--------------------|---|
| November 10, 1996  | Submit monthly progress report                    |
| December 10, 1996  | Submit monthly progress report                    |
| January 10, 1997   | Submit monthly progress report                    |
| February 10, 1997  | Submit monthly progress report                    |
| March 10, 1997     | Submit monthly progress report                    |
| April 10, 1997     | Submit monthly progress report                    |
| May 9, 1997        | Submit monthly progress report                    |
| May 13, 1997       | Sample seep piezometers                           |
| June 9, 1997       | Submit monthly progress report                    |
| July 8, 1997       | Submit monthly progress report                    |
| August 8, 1997     | Submit monthly progress report                    |
| September 10, 1997 | Submit monthly progress report                    |
| October 10, 1997   | Submit monthly progress report                    |
| November 10, 1997  | Submit monthly progress report                    |
| December 10, 1997  | Submit monthly progress report                    |
| January 9, 1998    | Submit monthly progress report                    |
| February 10, 1998  | Submit monthly progress report                    |
| March 10, 1998     | Submit monthly progress report                    |
| April 8, 1998      | Submit monthly progress report                    |
| May 7, 1998        | Submit monthly progress report                    |
| June 9, 1998       | Submit monthly progress report                    |
| June 30, 1998      | Sample Seep Sheen                                 |
| July 10, 1998      | Submit monthly progress report                    |
| August 7, 1998     | Submit monthly progress report                    |
| August 19, 1998    | Install 1 new fabric barrier and remove 1 old one |
| September 10, 1998 | Submit monthly progress report                    |
| October 9, 1998    | Submit monthly progress report                    |
| November 10, 1998  | Submit monthly progress report                    |
| December 10, 1998  | Submit monthly progress report                    |
| January 8, 1999    | Submit monthly progress report                    |
| February 10, 1999  | Submit monthly progress report                    |
| March 9, 1999      | Submit monthly progress report                    |
| April 9, 1999      | Submit monthly progress report                    |
| May 10, 1999       | Submit monthly progress report                    |
| June 9, 1999       | Submit monthly progress report                    |
| July 9, 1999       | Submit monthly progress report                    |
| August 9, 1999     | Submit monthly progress report                    |
| September 10, 1999 | Submit monthly progress report                    |
| October 8, 1999    | Submit monthly progress report                    |
| November 8, 1999   | Submit monthly progress report                    |
| December 9, 1999   | Submit monthly progress report                    |
| January 10, 2000   | Submit monthly progress report                    |
| February 10, 2000  | Submit monthly progress report                    |

| <b>Date</b>        | <b>Task/Activity/Deliverable/Milestone</b> |
|--------------------|--|
| March 8, 2000      | Submit monthly progress report             |
| April 4, 2000      | Submit monthly progress report             |
| May 10, 2000       | Submit monthly progress report             |
| June 8, 2000       | Submit monthly progress report             |
| July 7, 2000       | Submit monthly progress report             |
| August 8, 2000     | Submit monthly progress report             |
| September 8, 2000  | Submit monthly progress report             |
| October 4, 2000    | Submit monthly progress report             |
| November 3, 2000   | Submit monthly progress report             |
| December 8, 2000   | Submit monthly progress report             |
| January 4, 2001    | Submit monthly progress report             |
| February 6, 2001   | Submit monthly progress report             |
| March 8, 2001      | Submit monthly progress report             |
| April 9, 2001      | Submit monthly progress report             |
| May 8, 2001        | Submit monthly progress report             |
| June 6, 2001       | Submit monthly progress report             |
| July 6, 2001       | Submit monthly progress report             |
| August 7, 2001     | Submit monthly progress report             |
| September 10, 2001 | Submit monthly progress report             |
| October 5, 2001    | Submit monthly progress report             |
| November 7, 2001   | Submit monthly progress report             |
| December 7, 2001   | Submit monthly progress report             |
| January 9, 2002    | Submit monthly progress report             |
| February 8, 2002   | Submit monthly progress report             |
| March 5, 2002      | Submit monthly progress report             |
| April 5, 2002      | Submit monthly progress report             |
| May 8, 2002        | Submit monthly progress report             |
| June 5, 2002       | Submit monthly progress report             |
| July 8, 2002       | Submit monthly progress report             |
| August 9, 2002     | Submit monthly progress report             |
| September 10, 2002 | Submit monthly progress report             |
| October 10, 2002   | Submit monthly progress report             |
| November 6, 2002   | Submit monthly progress report             |
| December 10, 2002  | Submit monthly progress report             |
| January 9, 2003    | Submit monthly progress report             |
| February 7, 2003   | Submit monthly progress report             |
| March 19, 2003     | Submit monthly progress report             |
| April 7, 2003      | Submit monthly progress report             |
| May 7, 2003        | Submit monthly progress report             |
| June 10, 2003      | Submit monthly progress report             |
| July 8, 2003       | Submit monthly progress report             |
| August 8, 2003     | Submit monthly progress report             |
| September 5, 2003  | Submit monthly progress report             |
| October 8, 2003    | Submit monthly progress report             |
| November 10, 2003  | Submit monthly progress report             |
| December 8, 2003   | Submit monthly progress report             |
| January 9, 2004    | Submit monthly progress report             |
| February 6, 2004   | Submit monthly progress report             |
| March 15, 2004     | Submit monthly progress report             |
| April 7, 2004      | Submit monthly progress report             |
| May 7, 2004        | Submit monthly progress report             |
| June 7, 2004       | Submit monthly progress report             |



| Date         | Task/Activity/Deliverable/Milestone |
|--------------|-------------------------------------|
| July 9, 2004 | Submit monthly progress report      |

**ATTACHMENT 1**  
**RESULTS OF MONTHLY SITE INSPECTION**  
**NEASE CHEMICAL SITE, SALEM, OHIO**  
**JUNE 2004**

**SITE INSPECTION FORM**  
**RUETGERS-NEASE CORPORATION**  
**Nease Site, Salem, Ohio**

Date of Inspection: 6-30-04

Entry Time: 8:30 Exit Time: 12:00

Weather: SUNNY 80°

Inspector's Name: DENNIS L. LAKE

Inspector's Company: Howells and Baird, Inc.

**INSPECTION RESULTS**

SPECIFIC OBSERVATIONS: Structures

(Responses: S = Satisfactory U = Unsatisfactory Yes/No Levels Measured in Feet, N/A = Not Applicable)

|                                      | Pump | Quick Connect | Water Level | Berm Erosion | Visible Leakage |
|--------------------------------------|------|---------------|-------------|--------------|-----------------|
| Leachate Collection System 1 (LCS-1) | S    | S             | 10.16       | N/A          | No              |
| Leachate Collection System 2 (LCS-2) | S    | S             | 6.94        | N/A          | No              |
| Pond 1 Pumphouse                     | S    | S             | 8.62        | N/A          | No              |
| Pond 1 Berm                          | N/A  | N/A           | N/A         | No           | No              |
| Pond 2 Embankment                    | N/A  | N/A           | N/A         | No           | No              |
| Exclusion Area A Embankment          | N/A  | N/A           | N/A         | No           | No              |
| Storage Tank                         | N/A  | S             | 4.96        | N/A          | No              |
| Other (specify)                      |      |               |             |              |                 |

## SPECIFIC OBSERVATIONS:

## Sediment Barriers

## Condition of Sediment Barriers

| Barrier ID                   | Fabric Intact? | By Passing Evident? | Is Maintenance Necessary? |
|------------------------------|----------------|---------------------|---------------------------|
| Sediment Control Structure 1 | YES            | No                  | No                        |
| Sediment Control Structure 2 | YES            | No                  | No                        |
| Fabric Barrier 2             | YES            | No                  | No                        |
| Fabric Barrier 3             | YES            | No                  | No                        |
| Fabric Barrier 4             | YES            | No                  | No                        |
| Fabric Barrier 5             | YES            | No                  | No                        |
| Fabric Barrier 8             | YES            | No                  | No                        |
| Fabric Barrier 9             | YES            | No                  | No                        |
| Fabric Barrier 10            | YES            | No                  | No                        |
| Rock Barrier 1               | YES            | No                  | No                        |
| Rock Barrier 2               | YES            | No                  | No                        |
| Pond 7 - North               | YES            | No                  | No                        |
| Pond 7 - South               | YES            | No                  | No                        |

## SPECIFIC OBSERVATIONS:

Seeps (if present, use more forms, as necessary)

| Seep ID<br>(yr-month-#) | Located on Map | Areal Extent<br>(ft 2) | Magnitude<br>(flow?, ponding?) |
|-------------------------|----------------|------------------------|--------------------------------|
| 94-7-1                  | YES            | 20                     | Non-Flowing Seep               |
| 96-8-2                  | YES            | 20                     | Non-Flowing Seep               |
|                         |                |                        |                                |
|                         |                |                        |                                |

Note: Seep ID # equal the "nth" observed seep during the yr-month in question

## ADDITIONAL OBSERVATION OR REMARKS:

Inspector's Name:

Dennis L. Lane

Inspector's Signature:

Dennis L. Lane

Date:

6-30-04

CRANE-DEMING COMPANY.

S13

CRANE  
DEMING  
SWAMP

96-8-2

94-7-1

S1



**ATTACHMENT 2**

**WATER/AIR SAMPLING RESULTS – MAY 18, 2004  
NEASE CHEMICAL SITE, SALEM, OHIO**

RUTGERS ORGANICS CORPORATION  
201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
Account Number: 155

Contact: RAINER DOMALSKI

Date Received: 19-MAY-04  
Date Reported: 27-JUN-04

Invoice Number: 33446

Date Collected: 18-MAY-04

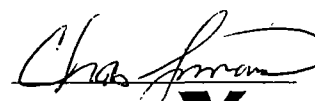
Client ID: INFLUENT 5-18-04

Lab ID: L35741-1

| PARAMETER              | UNITS    | RESULT | LIMIT<br>OF<br>QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|------------------------|----------|--------|-----------------------------|-------------|-----------|---------|
| PESTICIDE ANALYSIS     |          |        |                             |             |           |         |
| KEPONE                 | ug/L     | U 042  | .042                        | SOP 6.2     | 24-JUN-04 | CS      |
| PHOTOMIREX             | ug/L     | U 006  | 006                         | SOP 6.2     | 24-JUN-04 | CS      |
| MIREX                  | ug/L     | .13    | 002                         | SOP 6.2     | 24-JUN-04 | CS      |
| PH                     | PH UNITS | 6.46   | 0                           | EPA 150.1   | 01-JUN-04 | JPB     |
| TOTAL DISSOLVED SOLIDS | mg/L     | 589    | 10                          | EPA 160.1   | 24-MAY-04 | STL     |
| TOTAL SUSPENDED SOLIDS | mg/L     | 17.2   | 4                           | EPA 160.2   | 24-MAY-04 | STL     |

Comments: <none>

Submitted by  
Exygen Research  
Reviewed and Approved by



Charles Simons  
Laboratory Manager  
3058 Research Drive  
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RUTGERS ORGANICS CORPORATION  
201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
Account Number: 155

Contact: RAINER DOMALSKI

Date Received 19-MAY-04  
Date Reported 27-JUN-04

Invoice Number: 33446

Date Collected: 18-MAY-04

Client ID: LGAC 2-3-5-18-04

Lab ID: L35741-2

| PARAMETER                 | UNITS    | RESULT | LIMIT<br>OF<br>QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|---------------------------|----------|--------|-----------------------------|-------------|-----------|---------|
| PESTICIDE ANALYSIS        |          |        |                             |             |           |         |
| KEPONE                    | ug/L     | U 042  | .042                        | SOP 6 2     | 24-JUN-04 | CS      |
| PHOTOMIREX                | ug/L     | U 006  | .006                        | SOP 6 2     | 24-JUN-04 | CS      |
| MIREX                     | ug/L     | U .002 | .002                        | SOP 6 2     | 24-JUN-04 | CS      |
| PH                        | PH UNITS | 6.97   | 0                           | EPA 150.1   | 01-JUN-04 | JPB     |
| TOTAL DISSOLVED SOLIDS    | mg/L     | 544    | 10                          | EPA 160.1   | 24-MAY-04 | STL     |
| TOTAL SUSPENDED SOLIDS    | mg/L     | < 4    | 4                           | EPA 160.2   | 24-MAY-04 | STL     |
| VOLATILE ANALYSIS         |          |        |                             |             |           |         |
| VINYL CHLORIDE            | ug/L     | < 20   | 20                          | EPA 8260B   | 21-MAY-04 | JEG     |
| DICHLOROMETHANE           | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,1-DICHLOROETHENE        | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CIS-1,2-DICHLOROETHENE    | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TRANS-1,2-DICHLOROETHENE  | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CHLOROFORM                | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,2-DICHLOROETHANE        | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,1,1-TRICHLOROETHANE     | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,1,2,2-TETRACHLOROETHANE | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,2-DICHLOROPROPANE       | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TRICHLOROETHENE           | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| BENZENE                   | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TETRACHLOROETHENE         | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TOLUENE                   | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CHLOROBENZENE             | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| ETHYLBENZENE              | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| M, P-XYLENE               | ug/L     | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| O-XYLENE                  | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| ACETONE                   | ug/L     | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| 2-BUTANONE                | ug/L     | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| CHLOROMETHANE             | ug/L     | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| CIS-1,3-DICHLOROPROPENE   | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TRANS-1,3-DICHLOROPROPENE | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |



RUTGERS ORGANICS CORPORATION  
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STATE COLLEGE, PA 16801  
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Invoice Number: 33446

Date Collected 18-MAY-04

Client ID: LGAC 2-3-5-18-04

Lab ID: L35741-2

| PARAMETER            | UNITS | RESULT | LIMIT<br>OF<br>QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|----------------------|-------|--------|-----------------------------|-------------|-----------|---------|
| BROMOFORM            | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| DIBROMOCHLOROMETHANE | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| BROMODICHLOROMETHANE | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CARBON TETRACHLORIDE | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| BROMOMETHANE         | ug/L  | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |

Comments: <none>

Submitted by  
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Reviewed and Approved by:



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Contact: RAINER DOMALSKI

Date Received 19-MAY-04  
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Invoice Number 33446

Date Collected 18-MAY-04

Client ID: OUTFALL 5-18-04

Lab ID: L35741-3

| PARAMETER           | UNITS | RESULT  | LIMIT<br>OF<br>QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|---------------------|-------|---------|-----------------------------|-------------|-----------|---------|
| SILVER-LOW LEVEL    | mg/L  | < .0003 | .0003                       | EPA 6020    | 27-MAY-04 | JMS     |
| ALUMINUM-LOW LEVEL  | mg/L  | .0313   | .0005                       | EPA 6020    | 27-MAY-04 | JMS     |
| ARSENIC-LOW LEVEL   | mg/L  | .0314   | .0003                       | EPA 6020    | 27-MAY-04 | JMS     |
| BERYLLIUM-LOW LEVEL | mg/L  | < .0004 | .0004                       | EPA 6020    | 27-MAY-04 | JMS     |
| BOD-5 DAY           | mg/L  | < 2     | 2                           | SM 5210     | 20-MAY-04 | TGA     |
| CADMIUM-LOW LEVEL   | mg/L  | < .0003 | .0003                       | EPA 6020    | 27-MAY-04 | JMS     |
| CYANIDE-FREE        | mg/L  | < .005  | .005                        | EPA 335.4   | 25-MAY-04 | JPB     |
| COD                 | mg/L  | 10.8    | 10                          | EPA 410.4   | 21-MAY-04 | STL     |
| CHROMIUM-LOW LEVEL  | mg/L  | .000732 | .0006                       | EPA 6020    | 27-MAY-04 | JMS     |
| COPPER-LOW LEVEL    | mg/L  | .00153  | .001                        | EPA 6020    | 27-MAY-04 | JMS     |
| IRON-LOW LEVEL      | mg/L  | 1.01    | .0005                       | EPA 6020    | 27-MAY-04 | JMS     |
| MERCURY             | mg/L  | < .0002 | .0002                       | EPA 7470A   | 22-MAY-04 | STL     |
| PESTICIDE ANALYSIS  |       |         |                             |             |           |         |
| KEPONE              | ug/L  | U .047  | .047                        | SOP 6.2     | 24-JUN-04 | CS      |
| PHOTOMIREX          | ug/L  | U .007  | .007                        | SOP 6.2     | 24-JUN-04 | CS      |
| MIREX               | ug/L  | U .002  | .002                        | SOP 6.2     | 24-JUN-04 | CS      |
| AMMONIA             | mg/L  | .65     | .1                          | EPA 350.1   | 25-MAY-04 | STL     |
| NICKEL-LOW LEVEL    | mg/L  | .0174   | .0006                       | EPA 6020    | 27-MAY-04 | JMS     |
| OIL & GREASE        | mg/L  | < 6.6   | 6.6                         | EPA 1664A   | 28-MAY-04 | STL     |

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Invoice Number: 33446

Date Collected: 18-MAY-04

Client ID OUTFALL 5-18-04

Lab ID L35741-3

| PARAMETER                  | UNITS    | RESULT  | LIMIT<br>OF<br>QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|----------------------------|----------|---------|-----------------------------|-------------|-----------|---------|
| LEAD-LOW LEVEL             | mg/L     | < .0003 | 0003                        | EPA 6020    | 27-MAY-04 | JMS     |
| PESTICIDE/PCB ANALYSIS     |          |         |                             |             |           |         |
| GAMMA-BHC                  | ug/L     | < .02   | .02                         | EPA 8081    | 17-JUN-04 | KAB     |
| PH                         | PH UNITS | 7.04    | 0                           | EPA 150.1   | 01-JUN-04 | JPB     |
| ANTIMONY-LOW LEVEL         | mg/L     | < .0004 | 0004                        | EPA 6020    | 27-MAY-04 | JMS     |
| SEMI-VOLATILE ANALYSIS     |          |         |                             |             |           |         |
| ANTHRACENE                 | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| BENZO (A) ANTHRACENE       | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| BENZO (K) FLUORANTHENE     | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| 3,4-BENZOFUORANTHENE       | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| BENZO (B) FLUORANTHENE     | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| BENZO (G, H, I) PERYLENE   | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| BENZO (A) PYRENE           | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| CHRYSENE                   | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| DIBENZ (A, H) ANTHRACENE   | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| FLUORENE                   | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| INDENO (1, 2, 3-CD) PYRENE | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| NAPHTHALENE                | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| PHENANTHRENE               | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| PYRENE                     | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| PHENOL                     | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| 4-METHYLPHENOL             | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| 1,3-DICHLOROBENZENE        | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| 1,4-DICHLOROBENZENE        | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| 1,2-DICHLOROBENZENE        | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| DIMETHYL PHTHALATE         | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| BUTYLBENZYL PHTHALATE      | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| DI-N-BUTYL PHTHALATE       | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| 2-METHYLNAPHTHALENE        | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| 3,4-DICHLORONITROBENZENE   | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| DIPHENYL SULFONE           | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |

RUTGERS ORGANICS CORPORATION  
201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
Account Number. 155

Contact. RAINER DOMALSKI

Date Received: 19-MAY-04  
Date Reported 27-JUN-04

Invoice Number 33446

Date Collected 18-MAY-04

Client ID. OUTFALL 5-18-04

Lab ID: L35741-3

| PARAMETER                 | UNITS | RESULT | LIMIT<br>OF<br>QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|---------------------------|-------|--------|-----------------------------|-------------|-----------|---------|
| TOTAL DISSOLVED SOLIDS    | mg/L  | 461    | 10                          | EPA 160.1   | 24-MAY-04 | STL     |
| THALLIUM-LOW LEVEL        | mg/L  | 000576 | .0002                       | EPA 6020    | 27-MAY-04 | JMS     |
| TOTAL ORGANIC CARBON      | mg/L  | < 1    | 1                           | EPA 415.1   | 21-MAY-04 | STL     |
| TOTAL SUSPENDED SOLIDS    | mg/L  | < 4    | 4                           | EPA 160 2   | 24-MAY-04 | STL     |
| VOLATILE ANALYSIS         |       |        |                             |             |           |         |
| VINYL CHLORIDE            | ug/L  | < 20   | 20                          | EPA 8260B   | 21-MAY-04 | JEG     |
| DICHLOROMETHANE           | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,1-DICHLOROETHENE        | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CIS-1,2-DICHLOROETHENE    | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TRANS-1,2-DICHLOROETHENE  | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CHLOROFORM                | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,2-DICHLOROETHANE        | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,1,1-TRICHLOROETHANE     | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,1,2,2-TETRACHLOROETHANE | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,2-DICHLOROPROPANE       | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TRICHLOROETHENE           | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| BENZENE                   | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TETRACHLOROETHENE         | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TOLUENE                   | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CHLOROBENZENE             | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| ETHYLBENZENE              | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| M,P-XYLENE                | ug/L  | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| O-XYLENE                  | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| ACETONE                   | ug/L  | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| 2-BUTANONE                | ug/L  | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| CHLOROMETHANE             | ug/L  | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| CIS-1,3-DICHLOROPROPENE   | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TRANS-1,3-DICHLOROPROPENE | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| BROMOFORM                 | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| DIBROMOCHLOROMETHANE      | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| BROMODICHLOROMETHANE      | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CARBON TETRACHLORIDE      | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |

RUTGERS ORGANICS CORPORATION  
201 STRUBLE ROAD  
STATE COLLEGE , PA 16801  
Account Number 155

Contact. RAINER DOMALSKI

Date Received: 19-MAY-04  
Date Reported 27-JUN-04

Invoice Number 33446

Date Collected: 18-MAY-04

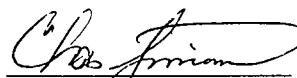
Client ID: OUTFALL 5-18-04

Lab ID: L35741-3

| PARAMETER      | UNITS | RESULT | LIMIT<br>OF<br>QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|----------------|-------|--------|-----------------------------|-------------|-----------|---------|
| BROMOMETHANE   | ug/L  | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| ZINC-LOW LEVEL | mg/L  | .0427  | .0005                       | EPA 6020    | 27-MAY-04 | JMS     |

Comments: <none>

Submitted by  
Exygen Research  
Reviewed and Approved by



Charles Simons  
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RUTGERS ORGANICS CORPORATION/EHS DEPT.  
201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
ACCOUNT: 155

Date Received: 19-May-04

Date Reported: 1-Jun-04

Invoice Number: 33446

Contact RAINER DOMALSKI

Date Collected: 18-May-04

Client ID: AGAC-1-2-5-18-04

Lab ID: L35741-4

| PARAMETER                 |  | UNITS     | RESULT | LIMIT<br>OF<br>QUANTITATION | TEST METHOD  | TEST DATE | ANALYST |
|---------------------------|--|-----------|--------|-----------------------------|--------------|-----------|---------|
| VOLATILE ANALYSIS         |  |           |        |                             |              |           |         |
| BROMODICHLOROMETHANE      |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| BROMOFORM                 |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| DIBROMOCHLOROMETHANE      |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| DIBROMOMETHANE            |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TRANS-1,2-DICHLOROETHANE  |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CUMENE                    |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| N-PROPYLBENZENE           |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,2,3-TRICHLOROPROPANE    |  | ppb (v/v) | < 3.2  | 3.2                         | EPA-19 TO-14 | 27-May-04 | STL     |
| DICHLORODIFLUOROMETHANE   |  | ppb (v/v) | < 2.0  | 2.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| VINYL CHLORIDE            |  | ppb (v/v) | 86     | 2.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CHLOROETHANE              |  | ppb (v/v) | < 2.0  | 2.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TRICHLOROFLUOROMETHANE    |  | ppb (v/v) | < 2.0  | 2.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,1-DICHLOROETHENE        |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,1-DICHLOROETHANE        |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CIS-1,2-DICHLOROETHENE    |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CHLOROFORM                |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,1,1-TRICHLOROETHANE     |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CARBON TETRACHLORIDE      |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| BENZENE                   |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,2-DICHLOROETHANE        |  | ppb (v/v) | 2.5    | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TRICHLOROETHENE           |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,2-DICHLOROPROPANE       |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CIS-1,3-DICHLOROPROPENE   |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TOLUENE                   |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TRANS-1,3-DICHLOROPROPENE |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,1,2-TRICHLOROETHANE     |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TETRACHLOROETHENE         |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,2-DIBROMOETHANE (EDB)   |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CHLOROBENZENE             |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| ETHYLBENZENE              |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| M,P-XYLENE                |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| O-XYLENE                  |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| STYRENE                   |  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |

RUTGERS ORGANICS CORPORATION/EHS DEPT.  
201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
ACCOUNT 155

Contact RAINER DOMALSKI

Client ID AGAC-1-2-5-18-04

Lab ID: L35741-4

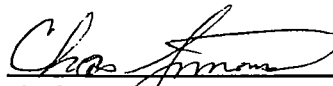
Date Received 19-May-04  
Date Reported 1-Jun-04

Invoice Number. 33446

Date Collected: 18-May-04

| PARAMETER                 | UNITS     | RESULT | LIMIT<br>OF  |              |           |         |
|---------------------------|-----------|--------|--------------|--------------|-----------|---------|
|                           |           |        | QUANTITATION | TEST METHOD  | TEST DATE | ANALYST |
| 1,1,2,2-TETRACHLOROETHANE | ppb (v/v) | < 1.3  | 1.3          | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,3,5-TRIMETHYLBENZENE    | ppb (v/v) | < 1.3  | 1.3          | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,3-DICHLOROBENZENE       | ppb (v/v) | < 1.3  | 1.3          | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,4-DICHLOROBENZENE       | ppb (v/v) | < 1.3  | 1.3          | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,2-DICHLOROBENZENE       | ppb (v/v) | 3.6    | 1.3          | EPA-19 TO-14 | 27-May-04 | STL     |

Submitted by  
Exygen Research  
Reviewed and Approved by

  
Charles Simons  
Laboratory Manager

RUTGERS ORGANICS CORPORATION/EHS DEPT.  
201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
ACCOUNT. 155

Date Received: 19-May-04

Date Reported: 1-Jun-04

Invoice Number: 33446

Contact: RAINER DOMALSKI

Date Collected: 18-May-04

Client ID: AGAC-1-2-5-18-04

Lab ID: L35741-4

MASS SPECTROMETER/DATA SYSTEM (MSDS) TENTATIVELY IDENTIFIED COMPOUNDS

| PARAMETER | UNITS | ESTIMATED<br>RESULT | RETENTION<br>TIME | TEST METHOD  | TEST DATE | ANALYST |
|-----------|-------|---------------------|-------------------|--------------|-----------|---------|
| NONE      |       |                     |                   | EPA-19 TO-14 | 27-May-04 | STL     |

M Result was measured against nearest internal standard assuming a response factor of 1.

Submitted by

Exygen Research

Reviewed and Approved by:



Charles Simons

Laboratory Manager



RUTGERS ORGANICS CORPORATION/EHS DEPT.  
201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
ACCOUNT: 155

Date Received: 19-May-04  
Date Reported 1-Jun-04

Invoice Number: 33446

Contact: RAINER DOMALSKI

Date Collected: 18-May-04

Client ID: AGAC-F-5-18-04

Lab ID: L35741-5

| PARAMETER                 | UNITS     | RESULT | LIMIT<br>OF<br>QUANTITATION | TEST METHOD  | TEST DATE | ANALYST |
|---------------------------|-----------|--------|-----------------------------|--------------|-----------|---------|
| <b>VOLATILE ANALYSIS</b>  |           |        |                             |              |           |         |
| BROMODICHLOROMETHANE      | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| BROMOFORM                 | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| DIBROMOCHLOROMETHANE      | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| DIBROMOMETHANE            | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TRANS-1,2-DICHLOROETHANE  | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CUMENE                    | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| N-PROPYLBENZENE           | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,2,3-TRICHLOROPROPANE    | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| DICHLORODIFLUOROMETHANE   | ppb (v/v) | < 2.0  | 2.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| VINYL CHLORIDE            | ppb (v/v) | < 2.0  | 2.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CHLOROETHANE              | ppb (v/v) | < 2.0  | 2.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TRICHLOROFLUOROMETHANE    | ppb (v/v) | < 2.0  | 2.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,1-DICHLOROETHENE        | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,1-DICHLOROETHANE        | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CIS-1,2-DICHLOROETHENE    | ppb (v/v) | 1.2    | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CHLOROFORM                | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,1,1-TRICHLOROETHANE     | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CARBON TETRACHLORIDE      | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| BENZENE                   | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,2-DICHLOROETHANE        | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TRICHLOROETHENE           | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,2-DICHLOROPROPANE       | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CIS-1,3-DICHLOROPROPENE   | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TOLUENE                   | ppb (v/v) | 7.6    | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TRANS-1,3-DICHLOROPROPENE | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,1,2-TRICHLOROETHANE     | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TETRACHLOROETHENE         | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,2-DIBROMOETHANE (EDB)   | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CHLOROBENZENE             | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| ETHYLBENZENE              | ppb (v/v) | 3.3    | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| M, P-XYLENE               | ppb (v/v) | 9.1    | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| O-XYLENE                  | ppb (v/v) | 1.9    | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| STYRENE                   | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |

RUTGERS ORGANICS CORPORATION/EHS DEPT.  
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Invoice Number 33446

Contact RAINER DOMALSKI


Date Collected: 18-May-04

Client ID: AGAC-F-5-18-04

Lab ID: L35741-5

| PARAMETER                 | UNITS     | RESULT | LIMIT<br>OF  |              |           |         |
|---------------------------|-----------|--------|--------------|--------------|-----------|---------|
|                           |           |        | QUANTITATION | TEST METHOD  | TEST DATE | ANALYST |
| 1,1,2,2-TETRACHLOROETHANE | ppb (v/v) | < 1.0  | 1.0          | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,3,5-TRIMETHYLBENZENE    | ppb (v/v) | < 1.0  | 1.0          | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,3-DICHLOROBENZENE       | ppb (v/v) | < 1.0  | 1.0          | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,4-DICHLOROBENZENE       | ppb (v/v) | < 1.0  | 1.0          | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,2-DICHLOROBENZENE       | ppb (v/v) | 2.6    | 1.0          | EPA-19 TO-14 | 27-May-04 | STL     |

Submitted by  
Exygen Research  
Reviewed and Approved by

  
Charles Simons  
Laboratory Manager

RUTGERS ORGANICS CORPORATION/EHS DEPT  
201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
ACCOUNT 155

Date Received: 19-May-04  
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Contact: RAINER DOMALSKI

Date Collected: 18-May-04

Client ID: AGAC-F-5-18-04

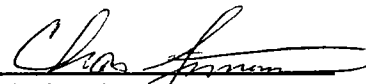
Lab ID: L35741-5

### MASS SPECTROMETER/DATA SYSTEM (MSDS) TENTATIVELY IDENTIFIED COMPOUNDS

| PARAMETER                      | UNITS     | ESTIMATED<br>RESULT | RETENTION<br>TIME | TEST METHOD  | TEST DATE | ANALYST |
|--------------------------------|-----------|---------------------|-------------------|--------------|-----------|---------|
| UNKNOWN                        | ppb (v/v) | 2.1 NJ              | M 4.3949          | EPA-19 TO-14 | 27-May-04 | STL     |
| ETHANOL                        | ppb (v/v) | 1.3 NJ              | M 5.2987          | EPA-19 TO-14 | 27-May-04 | STL     |
| UNKNOWN                        | ppb (v/v) | 7.9 NJ              | M 5.6053          | EPA-19 TO-14 | 27-May-04 | STL     |
| UNKNOWN                        | ppb (v/v) | 2.4 NJ              | M 5.9819          | EPA-19 TO-14 | 27-May-04 | STL     |
| UNKNOWN                        | ppb (v/v) | 4.2 NJ              | M 6.0949          | EPA-19 TO-14 | 27-May-04 | STL     |
| UNKNOWN                        | ppb (v/v) | 11 NJ               | M 8.8922          | EPA-19 TO-14 | 27-May-04 | STL     |
| UNKNOWN                        | ppb (v/v) | 25 NJ               | M 9.527           | EPA-19 TO-14 | 27-May-04 | STL     |
| DECANE                         | ppb (v/v) | 2.5 NJ              | M 18.962          | EPA-19 TO-14 | 27-May-04 | STL     |
| BENZENE, 1,2,4-TRIMETHYL-      | ppb (v/v) | 11 NJ               | M 19.108          | EPA-19 TO-14 | 27-May-04 | STL     |
| UNDECANE                       | ppb (v/v) | 2.4 NJ              | M 20.216          | EPA-19 TO-14 | 27-May-04 | STL     |
| BENZENE, 1-METHYL-2-(METHYLE   | ppb (v/v) | 1.3 NJ              | M 20.721          | EPA-19 TO-14 | 27-May-04 | STL     |
| ACETIC ACID, 2-ETHYLHEXYL ESTE | ppb (v/v) | 1.7 NJ              | M 20.759          | EPA-19 TO-14 | 27-May-04 | STL     |

M: Result was measured against nearest internal standard assuming a response factor of 1.

Submitted by  
Exygen Research  
Reviewed and Approved by.

  
Charles Simons  
Laboratory Manager

RUTGERS ORGANICS CORPORATION  
201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
Account Number 155

Contact: RAINER DOMALSKI

Date Received 19-MAY-04  
Date Reported. 27-JUN-04

Invoice Number: 33446

Date Collected. 13-MAY-04

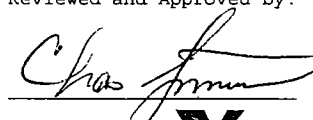
Client ID: TRIP BLANK

Lab ID L35741-6

| PARAMETER                 | UNITS | RESULT | LIMIT<br>OF<br>QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|---------------------------|-------|--------|-----------------------------|-------------|-----------|---------|
| VOLATILE ANALYSIS         |       |        |                             |             |           |         |
| VINYL CHLORIDE            | ug/L  | < 20   | 20                          | EPA 8260B   | 21-MAY-04 | JEG     |
| DICHLOROMETHANE           | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,1-DICHLOROETHENE        | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CIS-1,2-DICHLOROETHENE    | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TRANS-1,2-DICHLOROETHENE  | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CHLOROFORM                | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,2-DICHLOROETHANE        | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,1,1-TRICHLOROETHANE     | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,1,2,2-TETRACHLOROETHANE | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,2-DICHLOROPROPANE       | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TRICHLOROETHENE           | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| BENZENE                   | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TETRACHLOROETHENE         | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TOLUENE                   | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CHLOROBENZENE             | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| ETHYLBENZENE              | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| M, P-XYLENE               | ug/L  | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| O-XYLENE                  | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| ACETONE                   | ug/L  | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| 2-BUTANONE                | ug/L  | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| CHLOROMETHANE             | ug/L  | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| CIS-1,3-DICHLOROPROPENE   | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TRANS-1,3-DICHLOROPROPENE | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| BROMOFORM                 | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| DIBROMOCHLOROMETHANE      | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| BROMODICHLOROMETHANE      | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CARBON TETRACHLORIDE      | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| BROMOMETHANE              | ug/L  | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |

Comments: <none>

Submitted by  
Exygen Research  
Reviewed and Approved by:



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## NARRATIVE

Exygen Research (PADEP ID# 14-347)  
Project: L35741

### Sample Receipt:

Samples were received on May 19, 2004. The samples were received in two sample coolers at 0.9°C, and 1.7°C.

### Sample Analysis:

There were no problems related to the analysis of these samples.

### Holding Times:

Samples were analyzed within holding times.

### Sub-contract Laboratories:

Todd Giddings and Associates of State College, PA (PADEP ID# 14-321) performed the BOD analysis on these samples.

Severn Trent Laboratories (STL) of Pittsburgh, PA (PADEP ID# 02-416) performed the COD, total organic carbon, total suspended solids, total dissolved solids, mercury, ammonia nitrogen, free cyanide, and oil and grease analysis.

Severn Trent Laboratories (STL) of Knoxville, TN (PADEP ID# 68-576) performed the GC/MS volatiles (air) analysis.

RUTGERS ORGANICS CORPORATION  
201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
Account Number: 155

Contact: RAINER DOMALSKI

Date Received: 19-MAY-04

Date Reported: 27-JUN-04

Invoice Number: 33446

Date Collected: 18-MAY-04


Client ID: INFLUENT 5-18-04

Lab ID: L35741-1

| PARAMETER                 | UNITS    | RESULT | LIMIT<br>OF<br>QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|---------------------------|----------|--------|-----------------------------|-------------|-----------|---------|
| <b>PESTICIDE ANALYSIS</b> |          |        |                             |             |           |         |
| KEPONE                    | ug/L     | U .042 | .042                        | SOP 6.2     | 24-JUN-04 | CS      |
| PHOTOMIREX                | ug/L     | U .006 | .006                        | SOP 6.2     | 24-JUN-04 | CS      |
| MIREX                     | ug/L     | .13    | .002                        | SOP 6.2     | 24-JUN-04 | CS      |
| PH                        | PH UNITS | 6.46   | 0                           | EPA 150.1   | 01-JUN-04 | JPB     |
| TOTAL DISSOLVED SOLIDS    | mg/L     | 589    | 10                          | EPA 160.1   | 24-MAY-04 | STL     |
| TOTAL SUSPENDED SOLIDS    | mg/L     | 17.2   | 4                           | EPA 160.2   | 24-MAY-04 | STL     |

Comments: <none>

Submitted by  
Exygen Research  
Reviewed and Approved by:



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201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
Account Number: 155

Contact: RAINER DOMALSKI

Date Received: 19-MAY-04

Date Reported: 27-JUN-04

Invoice Number: 33446

Date Collected: 18-MAY-04

Client ID: LGAC 2-3-5-18-04

Lab ID: L35741-2

| PARAMETER                 | UNITS    | RESULT | LIMIT<br>OF<br>QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|---------------------------|----------|--------|-----------------------------|-------------|-----------|---------|
| <b>PESTICIDE ANALYSIS</b> |          |        |                             |             |           |         |
| KEPONE                    | ug/L     | U .042 | .042                        | SOP 6.2     | 24-JUN-04 | CS      |
| PHOTOMIREX                | ug/L     | U .006 | .006                        | SOP 6.2     | 24-JUN-04 | CS      |
| MIREX                     | ug/L     | U .002 | .002                        | SOP 6.2     | 24-JUN-04 | CS      |
| PH                        | PH UNITS | 6.97   | 0                           | EPA 150.1   | 01-JUN-04 | JPB     |
| TOTAL DISSOLVED SOLIDS    | mg/L     | 544    | 10                          | EPA 160.1   | 24-MAY-04 | STL     |
| TOTAL SUSPENDED SOLIDS    | mg/L     | < 4    | 4                           | EPA 160.2   | 24-MAY-04 | STL     |
| <b>VOLATILE ANALYSIS</b>  |          |        |                             |             |           |         |
| VINYL CHLORIDE            | ug/L     | < 20   | 20                          | EPA 8260B   | 21-MAY-04 | JEG     |
| DICHLOROMETHANE           | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,1-DICHLOROETHENE        | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CIS-1,2-DICHLOROETHENE    | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TRANS-1,2-DICHLOROETHENE  | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CHLOROPORM                | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,2-DICHLOROETHANE        | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,1,1-TRICHLOROETHANE     | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,1,2,2-TETRACHLOROETHANE | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,2-DICHLOROPROPANE       | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TRICHLOROETHENE           | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| BENZENE                   | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TETRACHLOROETHENE         | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TOLUENE                   | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CHLOROBENZENE             | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| ETHYLBENZENE              | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| M, P-XYLENE               | ug/L     | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| O-XYLENE                  | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| ACETONE                   | ug/L     | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| 2-BUTANONE                | ug/L     | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| CHLOROMETHANE             | ug/L     | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| CIS-1,3-DICHLOROPROPENE   | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TRANS-1,3-DICHLOROPROPENE | ug/L     | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |

RUTGERS ORGANICS CORPORATION  
201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
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Invoice Number: 33446

Date Collected: 18-MAY-04

Client ID: LGAC 2-3-5-18-04

Lab ID: L35741-2

| PARAMETER            | UNITS | RESULT | LIMIT<br>OF<br>QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|----------------------|-------|--------|-----------------------------|-------------|-----------|---------|
| BROMOFORM            | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| DIBROMOCHLOROMETHANE | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| BROMODICHLOROMETHANE | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CARBON TETRACHLORIDE | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| BROMOMETHANE         | ug/L  | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |

Comments: <none>

Submitted by  
Exygen Research  
Reviewed and Approved by:



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201 STRUBLE ROAD  
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Date Received: 19-MAY-04  
Date Reported: 27-JUN-04

Invoice Number: 33446

Date Collected: 18-MAY-04

Client ID: OUTFALL 5-18-04

Lab ID: L35741-3

| PARAMETER           | UNITS | RESULT  | LIMIT<br>OF<br>QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|---------------------|-------|---------|-----------------------------|-------------|-----------|---------|
| SILVER-LOW LEVEL    | mg/L  | < .0003 | .0003                       | EPA 6020    | 27-MAY-04 | JMS     |
| ALUMINUM-LOW LEVEL  | mg/L  | .0313   | .0005                       | EPA 6020    | 27-MAY-04 | JMS     |
| ARSENIC-LOW LEVEL   | mg/L  | .0314   | .0003                       | EPA 6020    | 27-MAY-04 | JMS     |
| BERYLLIUM-LOW LEVEL | mg/L  | < .0004 | .0004                       | EPA 6020    | 27-MAY-04 | JMS     |
| BOD-5 DAY           | mg/L  | < 2     | 2                           | SM 5210     | 20-MAY-04 | TGA     |
| CADMIUM-LOW LEVEL   | mg/L  | < .0003 | .0003                       | EPA 6020    | 27-MAY-04 | JMS     |
| CYANIDE-FREE        | mg/L  | < .005  | .005                        | EPA 335.4   | 25-MAY-04 | JPB     |
| COD                 | mg/L  | 10.8    | 10                          | EPA 410.4   | 21-MAY-04 | STL     |
| CHROMIUM-LOW LEVEL  | mg/L  | .000732 | .0006                       | EPA 6020    | 27-MAY-04 | JMS     |
| COPPER-LOW LEVEL    | mg/L  | .00153  | .001                        | EPA 6020    | 27-MAY-04 | JMS     |
| IRON-LOW LEVEL      | mg/L  | 1.01    | .0005                       | EPA 6020    | 27-MAY-04 | JMS     |
| MERCURY             | mg/L  | < .0002 | .0002                       | EPA 7470A   | 22-MAY-04 | STL     |
| PESTICIDE ANALYSIS  |       |         |                             |             |           |         |
| KEPONE              | ug/L  | U .047  | .047                        | SOP 6.2     | 24-JUN-04 | CS      |
| PHOTOMIREX          | ug/L  | U .007  | .007                        | SOP 6.2     | 24-JUN-04 | CS      |
| MIREX               | ug/L  | U .002  | .002                        | SOP 6.2     | 24-JUN-04 | CS      |
| AMMONIA             | mg/L  | .65     | .1                          | EPA 350.1   | 25-MAY-04 | STL     |
| NICKEL-LOW LEVEL    | mg/L  | .0174   | .0006                       | EPA 6020    | 27-MAY-04 | JMS     |
| OIL & GREASE        | mg/L  | < 6.6   | 6.6                         | EPA 1664A   | 28-MAY-04 | STL     |

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Date Collected: 18-MAY-04

Client ID: OUTFALL 5-18-04

Lab ID: L35741-3

| PARAMETER                           | UNITS    | RESULT  | LIMIT<br>OF<br>QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|-------------------------------------|----------|---------|-----------------------------|-------------|-----------|---------|
| LEAD-LOW LEVEL                      | mg/L     | < .0003 | .0003                       | EPA 6020    | 27-MAY-04 | JMS     |
| PESTICIDE/PCB ANALYSIS<br>GAMMA-BHC | ug/L     | < .02   | .02                         | EPA 8081    | 17-JUN-04 | KAB     |
| PH                                  | PH UNITS | 7.04    | 0                           | EPA 150.1   | 01-JUN-04 | JPB     |
| ANTIMONY-LOW LEVEL                  | mg/L     | < .0004 | .0004                       | EPA 6020    | 27-MAY-04 | JMS     |
| SEMI-VOLATILE ANALYSIS              |          |         |                             |             |           |         |
| ANTHRACENE                          | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| BENZO (A) ANTHRACENE                | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| BENZO (K) FLUORANTHENE              | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| 3,4-BENZOFUORANTHENE                | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| BENZO (B) FLUORANTHENE              | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| BENZO (G, H, I) PERYLENE            | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| BENZO (A) PYRENE                    | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| CHRYSENE                            | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| DIBENZ (A, H) ANTHRACENE            | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| FLUORENE                            | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| INDENO (1,2,3-CD) PYRENE            | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| NAPHTHALENE                         | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| PHENANTHRENE                        | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| PYRENE                              | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| PHENOL                              | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| 4-METHYLPHENOL                      | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| 1,3-DICHLOROBENZENE                 | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| 1,4-DICHLOROBENZENE                 | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| 1,2-DICHLOROBENZENE                 | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| DIMETHYL PHTHALATE                  | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| BUTYLBENZYL PHTHALATE               | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| DI-N-BUTYL PHTHALATE                | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| 2-METHYLNAPHTHALENE                 | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| 3,4-DICHLORONITROBENZENE            | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |
| DIPHENYL SULFONE                    | ug/L     | < 10    | 10                          | EPA 8270C   | 07-JUN-04 | CP      |

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201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
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Invoice Number: 33446

Date Collected: 18-MAY-04

Client ID: OUTFALL 5-18-04

Lab ID: L35741-3

| PARAMETER                 | UNITS | RESULT  | LIMIT<br>OF<br>QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|---------------------------|-------|---------|-----------------------------|-------------|-----------|---------|
| TOTAL DISSOLVED SOLIDS    | mg/L  | 461     | 10                          | EPA 160.1   | 24-MAY-04 | STL     |
| THALLIUM-LOW LEVEL        | mg/L  | .000576 | .0002                       | EPA 6020    | 27-MAY-04 | JMS     |
| TOTAL ORGANIC CARBON      | mg/L  | < 1     | 1                           | EPA 415.1   | 21-MAY-04 | STL     |
| TOTAL SUSPENDED SOLIDS    | mg/L  | < 4     | 4                           | EPA 160.2   | 24-MAY-04 | STL     |
| VOLATILE ANALYSIS         |       |         |                             |             |           |         |
| VINYL CHLORIDE            | ug/L  | < 20    | 20                          | EPA 8260B   | 21-MAY-04 | JEG     |
| DICHLOROMETHANE           | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,1-DICHLOROETHENE        | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CIS-1,2-DICHLOROETHENE    | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TRANS-1,2-DICHLOROETHENE  | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CHLOROFORM                | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,2-DICHLOROETHANE        | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,1,1-TRICHLOROETHANE     | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,1,2,2-TETRACHLOROETHANE | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,2-DICHLOROPROPANE       | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TRICHLOROETHENE           | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| BENZENE                   | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TETRACHLOROETHENE         | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TOLUENE                   | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CHLOROBENZENE             | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| ETHYLBENZENE              | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| M,P-XYLENE                | ug/L  | < 10    | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| O-XYLENE                  | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| ACETONE                   | ug/L  | < 10    | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| 2-BUTANONE                | ug/L  | < 10    | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| CHLOROMETHANE             | ug/L  | < 10    | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| CIS-1,3-DICHLOROPROPENE   | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TRANS-1,3-DICHLOROPROPENE | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| BROMOFORM                 | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| DIBROMOCHLOROMETHANE      | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| BROMODICHLOROMETHANE      | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CARBON TETRACHLORIDE      | ug/L  | < 5     | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |

RUTGERS ORGANICS CORPORATION  
201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
Account Number: 155  
Contact: RAINER DOMALSKI

Date Received: 19-MAY-04  
Date Reported: 27-JUN-04  
Invoice Number: 33446  
Date Collected: 18-MAY-04

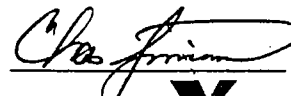
Client ID: OUTFALL 5-18-04

Lab ID: L35741-3

| PARAMETER      | UNITS | RESULT | LIMIT<br>OF<br>QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|----------------|-------|--------|-----------------------------|-------------|-----------|---------|
| BROMOMETHANE   | ug/L  | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| ZINC-LOW LEVEL | mg/L  | .0427  | .0005                       | EPA 6020    | 27-MAY-04 | JMS     |

Comments: <none>

Submitted by  
Exygen Research  
Reviewed and Approved by:



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RUTGERS ORGANICS CORPORATION/EHS DEPT.  
201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
ACCOUNT: 155

Contact: RAINER DOMALSKI

Date Received: 19-May-04

Date Reported: 1-Jun-04

Invoice Number: 33446

Date Collected: 18-May-04

Client ID: AGAC-1-2-5-18-04

Lab ID: L35741-4

| PARAMETER                 | UNITS     | RESULT | LIMIT<br>OF<br>QUANTITATION | TEST METHOD  | TEST DATE | ANALYST |
|---------------------------|-----------|--------|-----------------------------|--------------|-----------|---------|
| <b>VOLATILE ANALYSIS</b>  |           |        |                             |              |           |         |
| BROMODICHLOROMETHANE      | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| BROMOFORM                 | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| DIBROMOCHLOROMETHANE      | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| DIBROMOMETHANE            | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TRANS-1,2-DICHLOROETHANE  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CUMENE                    | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| N-PROPYLBENZENE           | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,2,3-TRICHLOROPROPANE    | ppb (v/v) | < 3.2  | 3.2                         | EPA-19 TO-14 | 27-May-04 | STL     |
| DICHLORODIFLUOROMETHANE   | ppb (v/v) | < 2.0  | 2.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| VINYL CHLORIDE            | ppb (v/v) | 86     | 2.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CHLOROETHANE              | ppb (v/v) | < 2.0  | 2.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TRICHLOROFLUOROMETHANE    | ppb (v/v) | < 2.0  | 2.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,1-DICHLOROETHENE        | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,1-DICHLOROETHANE        | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CIS-1,2-DICHLOROETHENE    | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CHLOROFORM                | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,1,1-TRICHLOROETHANE     | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CARBON TETRACHLORIDE      | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| BENZENE                   | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,2-DICHLOROETHANE        | ppb (v/v) | 2.5    | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TRICHLOROETHENE           | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,2-DICHLOROPROPANE       | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CIS-1,3-DICHLOROPROPENE   | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TOLUENE                   | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TRANS-1,3-DICHLOROPROPENE | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,1,2-TRICHLOROETHANE     | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TETRACHLOROETHENE         | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,2-DIBROMOETHANE (EDB)   | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CHLOROBENZENE             | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| ETHYLBENZENE              | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| M, P-XYLENE               | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| O-XYLENE                  | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |
| STYRENE                   | ppb (v/v) | < 1.3  | 1.3                         | EPA-19 TO-14 | 27-May-04 | STL     |

RUTGERS ORGANICS CORPORATION/EHS DEPT.  
201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
ACCOUNT: 155

Contact: RAINER DOMALSKI

Date Received: 19-May-04

Date Reported: 1-Jun-04

Invoice Number: 33446

Date Collected: 18-May-04

Client ID: AGAC-1-2-5-18-04

Lab ID: L35741-4

| PARAMETER                 | UNITS     | RESULT | LIMIT<br>OF  |              |           |         |
|---------------------------|-----------|--------|--------------|--------------|-----------|---------|
|                           |           |        | QUANTITATION | TEST METHOD  | TEST DATE | ANALYST |
| 1,1,2,2-TETRACHLOROETHANE | ppb (v/v) | < 1.3  | 1.3          | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,3,5-TRIMETHYLBENZENE    | ppb (v/v) | < 1.3  | 1.3          | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,3-DICHLOROBENZENE       | ppb (v/v) | < 1.3  | 1.3          | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,4-DICHLOROBENZENE       | ppb (v/v) | < 1.3  | 1.3          | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,2-DICHLOROBENZENE       | ppb (v/v) | 3.6    | 1.3          | EPA-19 TO-14 | 27-May-04 | STL     |

Submitted by

Exygen Research

Reviewed and Approved by:



Charles Simon

Laboratory Manager

RUTGERS ORGANICS CORPORATION/EHS DEPT.  
201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
ACCOUNT. 155

Contact: RAINER DOMALSKI

Client ID: AGAC-1-2-5-18-04

Lab ID: L35741-4

Date Received: 19-May-04

Date Reported: 1-Jun-04

Invoice Number: 33446

Date Collected: 18-May-04

MASS SPECTROMETER/DATA SYSTEM (MSDS) TENTATIVELY IDENTIFIED COMPOUNDS

| PARAMETER | UNITS | ESTIMATED<br>RESULT | RETENTION<br>TIME | TEST METHOD  | TEST DATE | ANALYST |
|-----------|-------|---------------------|-------------------|--------------|-----------|---------|
| NONE      |       |                     |                   | EPA-19 TO-14 | 27-May-04 | STL     |

M: Result was measured against nearest internal standard assuming a response factor of 1.

Submitted by  
Exygen Research  
Reviewed and Approved by:

  
Charles Simon  
Laboratory Manager

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RUTGERS ORGANICS CORPORATION/EHS DEPT.  
201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
ACCOUNT: 155

Date Received: 19-May-04  
Date Reported: 1-Jun-04

Invoice Number: 33446

Contact: RAINER DOMALSKI

Date Collected: 18-May-04

Client ID: AGAC-F-5-18-04

Lab ID: L35741-5

| PARAMETER                 | UNITS     | RESULT | LIMIT<br>OF<br>QUANTITATION | TEST METHOD  | TEST DATE | ANALYST |
|---------------------------|-----------|--------|-----------------------------|--------------|-----------|---------|
| <b>VOLATILE ANALYSIS</b>  |           |        |                             |              |           |         |
| BROMODICHLOROMETHANE      | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| BROMOFORM                 | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| DIBROMOCHLOROMETHANE      | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| DIBROMOMETHANE            | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TRANS-1,2-DICHLOROETHANE  | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CUMENE                    | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| N-PROPYLBENZENE           | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,2,3-TRICHLOROPROPANE    | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| DICHLORODIFLUOROMETHANE   | ppb (v/v) | < 2.0  | 2.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| VINYL CHLORIDE            | ppb (v/v) | < 2.0  | 2.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CHLOROETHANE              | ppb (v/v) | < 2.0  | 2.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TRICHLOROFLUOROMETHANE    | ppb (v/v) | < 2.0  | 2.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,1-DICHLOROETHENE        | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,1-DICHLOROETHANE        | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CIS-1,2-DICHLOROETHENE    | ppb (v/v) | 1.2    | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CHLOROFORM                | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,1,1-TRICHLOROETHANE     | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CARBON TETRACHLORIDE      | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| BENZENE                   | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,2-DICHLOROETHANE        | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TRICHLOROETHENE           | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,2-DICHLOROPROPANE       | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CIS-1,3-DICHLOROPROPENE   | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TOLUENE                   | ppb (v/v) | 7.6    | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TRANS-1,3-DICHLOROPROPENE | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,1,2-TRICHLOROETHANE     | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| TETRACHLOROETHENE         | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,2-DIBROMOETHANE (EDB)   | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| CHLOROBENZENE             | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| ETHYLBENZENE              | ppb (v/v) | 3.3    | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| M, P-XYLENE               | ppb (v/v) | 9.1    | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| O-XYLENE                  | ppb (v/v) | 1.9    | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |
| STYRENE                   | ppb (v/v) | < 1.0  | 1.0                         | EPA-19 TO-14 | 27-May-04 | STL     |



RUTGERS ORGANICS CORPORATION/EHS DEPT.  
201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
ACCOUNT: 155

Contact: RAINER DOMALSKI

Client ID: AGAC-F-5-18-04

Lab ID: L35741-5

Date Received: 19-May-04

Date Reported: 1-Jun-04

Invoice Number: 33446

Date Collected: 18-May-04

| PARAMETER                 | UNITS     | RESULT | LIMIT<br>OF  |              |           |         |
|---------------------------|-----------|--------|--------------|--------------|-----------|---------|
|                           |           |        | QUANTITATION | TEST METHOD  | TEST DATE | ANALYST |
| 1,1,2,2-TETRACHLOROETHANE | ppb (v/v) | < 1.0  | 1.0          | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,3,5-TRIMETHYLBENZENE    | ppb (v/v) | < 1.0  | 1.0          | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,3-DICHLOROBENZENE       | ppb (v/v) | < 1.0  | 1.0          | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,4-DICHLOROBENZENE       | ppb (v/v) | < 1.0  | 1.0          | EPA-19 TO-14 | 27-May-04 | STL     |
| 1,2-DICHLOROBENZENE       | ppb (v/v) | 2.6    | 1.0          | EPA-19 TO-14 | 27-May-04 | STL     |

Submitted by  
Exygen Research  
Reviewed and Approved by:

  
Charles Simons  
Laboratory Manager

RUTGERS ORGANICS CORPORATION/EHS DEPT.  
201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
ACCOUNT: 155

Contact: RAINER DOMALSKI

Client ID: AGAC-F-5-18-04

Lab ID: L35741-5

Date Received: 19-May-04

Date Reported: 1-Jun-04

Invoice Number: 33446


Date Collected: 18-May-04

### MASS SPECTROMETER/DATA SYSTEM (MSDS) TENTATIVELY IDENTIFIED COMPOUNDS

| PARAMETER                      | UNITS     | ESTIMATED<br>RESULT | RETENTION<br>TIME | TEST METHOD  | TEST DATE | ANALYST |
|--------------------------------|-----------|---------------------|-------------------|--------------|-----------|---------|
| UNKNOWN                        | ppb (v/v) | 2.1 NJ              | M 4.3949          | EPA-19 TO-14 | 27-May-04 | STL     |
| ETHANOL                        | ppb (v/v) | 1.3 NJ              | M 5.2987          | EPA-19 TO-14 | 27-May-04 | STL     |
| UNKNOWN                        | ppb (v/v) | 7.9 NJ              | M 5.6053          | EPA-19 TO-14 | 27-May-04 | STL     |
| UNKNOWN                        | ppb (v/v) | 2.4 NJ              | M 5.9819          | EPA-19 TO-14 | 27-May-04 | STL     |
| UNKNOWN                        | ppb (v/v) | 4.2 NJ              | M 6.0949          | EPA-19 TO-14 | 27-May-04 | STL     |
| UNKNOWN                        | ppb (v/v) | 11 NJ               | M 8.8922          | EPA-19 TO-14 | 27-May-04 | STL     |
| UNKNOWN                        | ppb (v/v) | 25 NJ               | M 9.527           | EPA-19 TO-14 | 27-May-04 | STL     |
| DECANE                         | ppb (v/v) | 2.5 NJ              | M 18.962          | EPA-19 TO-14 | 27-May-04 | STL     |
| BENZENE, 1,2,4-TRIMETHYL-      | ppb (v/v) | 11 NJ               | M 19.108          | EPA-19 TO-14 | 27-May-04 | STL     |
| UNDECANE                       | ppb (v/v) | 2.4 NJ              | M 20.216          | EPA-19 TO-14 | 27-May-04 | STL     |
| BENZENE, 1-METHYL-2-(METHYLE   | ppb (v/v) | 1.3 NJ              | M 20.721          | EPA-19 TO-14 | 27-May-04 | STL     |
| ACETIC ACID, 2-ETHYLHEXYL ESTE | ppb (v/v) | 1.7 NJ              | M 20.759          | EPA-19 TO-14 | 27-May-04 | STL     |

M: Result was measured against nearest internal standard assuming a response factor of 1.

Submitted by  
Oxygen Research  
Reviewed and Approved by:

  
Charles Simon  
Laboratory Manager

RUTGERS ORGANICS CORPORATION  
201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
Account Number: 155

Contact: RAINER DOMALSKI

Date Received: 19-MAY-04

Date Reported: 27-JUN-04

Invoice Number: 33446

Date Collected: 13-MAY-04

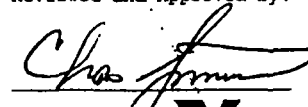
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Lab ID: L35741-6

| PARAMETER                 | UNITS | RESULT | LIMIT<br>OF<br>QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|---------------------------|-------|--------|-----------------------------|-------------|-----------|---------|
| <b>VOLATILE ANALYSIS</b>  |       |        |                             |             |           |         |
| VINYL CHLORIDE            | ug/L  | < 20   | 20                          | EPA 8260B   | 21-MAY-04 | JEG     |
| DICHLOROMETHANE           | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,1-DICHLOROETHENE        | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CIS-1,2-DICHLOROETHENE    | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TRANS-1,2-DICHLOROETHENE  | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CHLOROFORM                | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,2-DICHLOROETHANE        | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,1,1-TRICHLOROETHANE     | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,1,2,2-TETRACHLOROETHANE | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| 1,2-DICHLOROPROPANE       | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TRICHLOROETHENE           | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| BENZENE                   | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TETRACHLOROETHENE         | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TOLUENE                   | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CHLOROBENZENE             | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| ETHYLBENZENE              | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| M,P-XYLENE                | ug/L  | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| O-XYLENE                  | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| ACETONE                   | ug/L  | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| 2-BUTANONE                | ug/L  | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| CHLOROMETHANE             | ug/L  | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |
| CIS-1,3-DICHLOROPROPENE   | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| TRANS-1,3-DICHLOROPROPENE | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| BROMOFORM                 | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| DIBROMOCHLOROMETHANE      | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| BROMODICHLOROMETHANE      | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| CARBON TETRACHLORIDE      | ug/L  | < 5    | 5                           | EPA 8260B   | 21-MAY-04 | JEG     |
| BROMOMETHANE              | ug/L  | < 10   | 10                          | EPA 8260B   | 21-MAY-04 | JEG     |

Comments: <none>

Submitted by  
Exygen Research  
Reviewed and Approved by:



Charles Simons  
Laboratory Manager  
3058 Research Drive  
State College, PA 16801, USA

T: 814.272.1039  
F: 814.231.1580  
exygen.com

## NARRATIVE

Exygen Research (PADEP ID# 14-347)  
Project: L35741

### Sample Receipt:

Samples were received on May 19, 2004. The samples were received in two sample coolers at 0.9°C, and 1.7°C.

### Sample Analysis:

There were no problems related to the analysis of these samples.

### Holding Times:

Samples were analyzed within holding times.

### Sub-contract Laboratories:

Todd Giddings and Associates of State College, PA (PADEP ID# 14-321) performed the BOD analysis on these samples.

Severn Trent Laboratories (STL) of Pittsburgh, PA (PADEP ID# 02-416) performed the COD, total organic carbon, total suspended solids, total dissolved solids, mercury, ammonia nitrogen, free cyanide, and oil and grease analysis.

Severn Trent Laboratories (STL) of Knoxville, TN (PADEP ID# 68-576) performed the GC/MS volatiles (air) analysis.

**ATTACHMENT 3**

**WATER/AIR SAMPLING RESULTS – JUNE 2, 2004  
NEASE CHEMICAL SITE, SALEM, OHIO**

RUTGERS ORGANICS CORPORATION  
201 STRUBLE ROAD  
STATE COLLEGE, PA 16801  
Account Number: 155

Date Received: 03-JUN-04  
Date Reported: 20-JUN-04

Invoice Number: 33446

Contact: RAINER DOMALSKI

Date Collected: 02-JUN-04

Client ID: INFLUENT 6-2-04

Lab ID: L35758-1

RECEIVED  
JUN 18 2004  
By \_\_\_\_\_

| PARAMETER       | UNITS | RESULT | LIMIT<br>OF<br>QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|-----------------|-------|--------|-----------------------------|-------------|-----------|---------|
| AMMONIA         | mg/L  | 95     | 1                           | EPA 350 1   | 18-JUN-04 | STL     |
| NITRATE+NITRITE | mg/L  | < .1   | .1                          | EPA 353.2   | 10-JUN-04 | STL     |
| PHOSPHORUS      | mg/L  | < 1    | 1                           | EPA 365 2   | 16-JUN-04 | STL     |

Comments: <none>

Submitted by  
Exygen Research  
Reviewed and Approved by.

*Jeff Biss for*  
Charles Simons  
Laboratory Manager  
3058 Research Drive  
State College, PA 16801, USA  
T: 814.272.1039  
F: 814 231 1580  
exygen.com

RUTGERS ORGANICS CORPORATION  
201 STRUBLE ROAD  
STATE COLLEGE , PA 16801  
Account Number: 155  
  
Contact: RAINER DOMALSKI

Date Received 03-JUN-04  
Date Reported: 20-JUN-04

Invoice Number 33446

Date Collected: 02-JUN-04


Client ID: OUTFALL 6-2-04

Lab ID: L35758-2

| PARAMETER       | UNITS | RESULT | LIMIT<br>OF<br>QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|-----------------|-------|--------|-----------------------------|-------------|-----------|---------|
| AMMONIA         | mg/L  | 1.1    | .1                          | EPA 350 1   | 18-JUN-04 | STL     |
| NITRATE+NITRITE | mg/L  | < .1   | 1                           | EPA 353.2   | 10-JUN-04 | STL     |
| PHOSPHORUS      | mg/L  | 19     | 1                           | EPA 365 2   | 16-JUN-04 | STL     |

Comments: <none>

Submitted by  
Exygen Research  
Reviewed and Approved by

  
Charles Simons  
Laboratory Manager  
3058 Research Drive  
State College, PA 16801, USA  
T: 814.272.1039  
F: 814.231.1580  
exygen.com

## NARRATIVE

Exygen Research (PADEP ID# 14-347)  
Project: L35758

### Sample Receipt:

Samples were received on June 17, 2004. The samples were received in one sample cooler at 2.0°C.

### Sample Analysis:

There were no problems related to the analysis of these samples.

### Holding Times:

The samples were analyzed within holding time.

### Sub-contract Laboratories:

Severn Trent Laboratories (STL) of Pittsburgh, PA (PADEP ID# 02-416) performed the ammonia nitrogen analysis on these samples. Severn Trent Laboratories (STL) of North Canton, OH (PADEP ID# 68-340) performed the phosphorus analysis on these samples.



**ATTACHMENT 4**

**RESULTS OF TWO ACUTE TOXICITY EVALUATION  
FINAL EFFLUENT  
MAY 18 THROUGH MAY 22, 2004**

RESULTS OF TWO ACUTE TOXICITY EVALUATIONS OF  
RUTGERS ORGANICS CORPORATION,  
SALEM SITE LAGOON WATER TREATMENT PLANT  
FINAL EFFLUENT

AAT JOB # 51 - 01 - 69

May 18 – May 22 2004

Report Prepared for:

Rutgers Organics Corporation  
201 Struble Road  
State College, Pennsylvania 16801

Report Prepared by:

AMERICAN AQUATIC TESTING, INC.  
890 NORTH GRAHAM STREET  
ALLENTOWN, PENNSYLVANIA 18109

## INTRODUCTION

A set of two static acute toxicity tests were conducted with larval fathead minnows, *Pimephales promelas* (*P. promelas*) and the freshwater cladoceran, *Ceriodaphnia dubia* (*C. dubia*) to determine the relative toxicity of final effluent from the Rutgers Organics Corporation Lagoon Water Treatment Plant, Salem, Ohio. The 96-hour static fathead acute toxicity test and the 48-hour static *C. dubia* acute toxicity tests were conducted from May 18 to May 22 2004. The toxicity evaluations were conducted by American Aquatic Testing, Inc., Allentown, Pennsylvania.

All tests were performed according to procedures outlined in Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms, 4<sup>th</sup> Edition (EPA/600/4-90/027F) and Reporting and Testing Guidance for Biomonitoring Required by the Ohio Environmental Protection Agency, October 1991.

## MATERIALS

### TEST ORGANISMS

#### Fathead Minnow, *Pimephales promelas*

Larval fathead minnows used in acute testing were obtained from in-house cultures maintained by ABS, Inc.. Test age organisms are maintained in shallow depth basins containing 10L of moderately hard reconstituted water and are fed newly hatched *Artemia* (brine shrimp) nauplii twice a day up until test initiation. The test organisms were 02 days old at test initiation. No acclimation of these test organisms was required as they were raised in moderately hard reconstituted water, which was used for testing.

#### Freshwater Cladoceran, *Ceriodaphnia dubia*

Cladoceran neonates, *C. dubia* were obtained from AAT, Inc.'s in-house cultures. Cultures for generating test age (<24 hours old) neonates are maintained as single cultures in 30 mL soufflé cups containing 15 mL of moderately hard reconstituted water. These adults are transferred daily into fresh culture water and are fed a combination of a unicellular green alga (*Selenastrum capricornutum*) and a yeast/Cerophyll/trout chow (YCT) suspension. Broods released during a five hour period were pooled and used to initiate the acute toxicity test. No acclimation of these test organisms was required as they were raised in moderately hard reconstituted water, which was used for testing. Neonates were released between 0800 and 1300 of May 18, 2004.

### DILUTION WATER

Moderately hard reconstituted water was prepared in accordance to procedures outlined in EPA/600/4-90/027F and was used as dilution/control water for the toxicity tests. Deionized water (Specialty Filtration Products) and reagent grade chemicals were used to achieve the following concentrations: 96 mg/L of NaHCO<sub>3</sub>, 60.0 mg/L of MgSO<sub>4</sub> and 4.0 mg/L of KCl and 60.0mg/L of CaSO<sub>4</sub> 2H<sub>2</sub>O.

### TEST MATERIAL

The material tested was final effluent collected by Howells and Baird personnel with a grab sampler placed at the outfall. One grab sample was collected for each of the two acute toxicity tests. The sample, collected May 17, 2004, was shipped overnight to AAT, Inc. in a cooler containing ice and was used to initiate testing on May 18, 2004. A Chain-of-Custody accompanied the sample. Tests were initiated prior to the expiration of the 36-hour holding time.

## METHODS

*P. promelas* larvae (02 day old) were exposed to the effluent sample for 96 hours under static, non-renewal conditions. Test organisms were exposed in groups of 10 in 1 L glass beakers containing 500 mL of test solution with two replicates per concentration (20 organisms per concentration). The test organisms were fed prior to test initiation and at 48 hours.

*C. dubia* neonates (<24 hours old) were exposed to the effluent sample for 48 hours under static non-renewal conditions. Test organisms were exposed in groups of five in 30 mL soufflé cups containing 15 mL of test solution with four replicates per concentration (20 organisms per concentration). The test organisms were not fed during the test exposure.

Both sets of test chambers were placed in randomized positions in a temperature controlled environment maintained at  $25 \pm 1$  ° C. The highest concentration used for exposure was 100 %. A 0.56 dilution schedule was used to prepare sample concentrations of 56%, 32%, 18% and 10%, by volume. A control sample consisting of 100 % dilution water was also tested.

Surviving test organisms were counted daily. Dead test organisms and debris were removed daily at this time. Temperature was measured daily in a surrogate replicate placed alongside the test chambers. Dissolved oxygen, pH and conductivity were measured in one replicate chamber at each concentration at the beginning and end of the test exposure. Alkalinity and hardness were measured in the control and the 100% concentration at the beginning of the test exposure. The lighting regime was 16 hours light, 08 hours dark.

## RESULTS

### FATHEAD MINNOW 96-HOUR ACUTE TEST RESULTS

As a result of less than 50 % mortality in any test concentration during the exposure period the acute data was evaluated visually. Therefore, the 96-hour  $LC_{50}$  is > 100%. This result yields an Acute Toxic Unit; TUa ( $100\%/LC_{50}$ ) of 1.0.

### CERIODAPHNIA DUBIA 48-HOUR ACUTE TEST RESULTS

As a result of less than 50 % mortality in any test concentration during the exposure period the acute data was evaluated visually. Therefore, the 48-hour  $LC_{50}$  is > 100%. This result yields an Acute Toxic Unit; TUa ( $100\%/LC_{50}$ ) of 1.0.

Table I. Fathead Minnow Mortality Data

CLIENT: Rutgers Organics Corp., Salem Lagoon Water Treatment Plant  
 TEST: 96-hour Definitive Acute Toxicity Test  
 DATE: 18 – 22 May 2004

| Sample Type    | % Effluent | # of Organisms | Cumulative number of organisms affected at |       |       |       | % Mortality* |
|----------------|------------|----------------|--|-------|-------|-------|--------------|
|                |            |                | 24 hr                                      | 48 hr | 72 hr | 96 hr |              |
| Final Effluent | 0          | 20             | 0  | 0     | 0     | 0     | 0            |
|                | 10         | 20             | 0  | 0     | 0     | 0     | 0            |
|                | 18         | 20             | 0  | 0     | 0     | 0     | 0            |
|                | 32         | 20             | 1  | 1     | 1     | 1     | 5            |
|                | 56         | 20             | 1  | 1     | 2     | 2     | 10           |
|                | 100        | 20             | 0  | 0     | 1     | 1     | 5            |

\* Cumulative Percent Mortality at 96 hours

Table II. Fathead Minnow Physical/Chemical Measurements

CLIENT: Rutgers Organics Corp., Salem Lagoon Water Treatment Plant  
 TEST: 96-hour Definitive Acute Toxicity Test  
 DATE: 18 – 22 May 2004

| Time                | % Effluent by Volume |      |      |      |      |      |
|---------------------|----------------------|------|------|------|------|------|
|                     | 0                    | 10   | 18   | 32   | 56   | 100  |
| 0 hour              |                      |      |      |      |      |      |
| Conduct $\mu$ mhos  | 285                  | 349  | 382  | 448  | 598  | 820  |
| D.O. ppm            | 8.3                  | 8.0  | 7.8  | 7.6  | 7.1  | 5.6  |
| Temp. °C A          | 25.5                 | 25.5 | 25.5 | 25.5 | 25.5 | 25.5 |
| B                   | 25.5                 | 25.5 | 25.5 | 25.5 | 25.5 | 25.5 |
| pH Std .units       | 7.8                  | 7.8  | 7.7  | 7.6  | 7.4  | 7.3  |
| Alkalinity mg/L     | 70                   |      |      |      |      | 200  |
| Hardness mg/L       | 80                   |      |      |      |      | 370  |
| 24 hours A          | 26.0                 | 26.0 | 26.0 | 26.0 | 26.0 | 26.0 |
| Temp. °C B          | 26.0                 | 26.0 | 26.0 | 26.0 | 26.0 | 26.0 |
| 48 hours A          | 25.0                 | 25.0 | 25.0 | 25.0 | 25.0 | 25.0 |
| Temp. °C B          | 25.0                 | 25.0 | 25.0 | 25.0 | 25.0 | 25.0 |
| 72 hours A          | 26.0                 | 26.0 | 26.0 | 26.0 | 26.0 | 26.0 |
| Temp. °C B          | 26.0                 | 26.0 | 26.0 | 26.0 | 26.0 | 26.0 |
| 96 hours            |                      |      |      |      |      |      |
| Conduct. $\mu$ mhos | 299                  | 360  | 396  | 463  | 608  | 810  |
| D.O. ppm            | 7.0                  | 7.0  | 7.0  | 7.1  | 7.0  | 6.8  |
| pH Std .units       | 7.9                  | 7.9  | 8.0  | 8.1  | 8.3  | 8.3  |
| Temp. °C A          | 25.5                 | 25.5 | 25.5 | 25.5 | 25.5 | 25.5 |
| B                   | 25.5                 | 25.5 | 25.5 | 25.5 | 25.5 | 25.5 |

Table I. *Ceriodaphnia dubia* Mortality Data

CLIENT: Rutgers Organics Corp., Salem Lagoon Water Treatment Plant  
 TEST: 48 hour Definitive Acute Toxicity Test  
 DATE: 18-20 May 2004

| Sample Type    | % Effluent | # of Organisms | Cumulative number of organism affected at |          |  | % Mortality* |
|----------------|------------|----------------|---|----------|--|--------------|
|                |            |                | 24 hours                                  | 48 hours |  |              |
| Final Effluent | 0          | 20             | 0   | 0        |  | 0            |
|                | 10         | 20             | 0   | 0        |  | 0            |
|                | 18         | 20             | 0   | 1        |  | 5            |
|                | 32         | 20             | 0   | 0        |  | 0            |
|                | 56         | 20             | 0   | 0        |  | 0            |
|                | 100        | 20             | 1   | 1        |  | 5            |

\* Cumulative Percent Mortality at 48 hours

Table II. *Ceriodaphnia dubia* Physical/Chemical Measurements

CLIENT: Rutgers Organics Corp., Salem Lagoon Water Treatment Plant  
 TEST: 48 hour Definitive Acute Toxicity Test  
 DATE: 18-20 May 2004

| Time                | % Effluent by Volume |      |      |      |      |      |
|---------------------|----------------------|------|------|------|------|------|
|                     | 0                    | 10   | 18   | 32   | 56   | 100  |
| 0 hour              |                      |      |      |      |      |      |
| Conduct. $\mu$ mhos | 290                  | 340  | 380  | 450  | 595  | 825  |
| D.O. ppm            | 7.9                  | 7.5  | 7.4  | 7.3  | 6.6  | 5.5  |
| Temp. °C            | 25.5                 | 25.5 | 25.5 | 25.5 | 25.5 | 25.0 |
| pH Std .units       | 7.8                  | 7.7  | 7.6  | 7.6  | 7.4  | 7.2  |
| Alkalinity mg/L     | 70                   |      |      |      |      | 200  |
| Hardness mg/L       | 80                   |      |      |      |      | 370  |
| 24 hours            |                      |      |      |      |      |      |
| Temp. °C            | 25.5                 | 25.5 | 25.5 | 25.5 | 25.5 | 25.5 |
| 48 hours            |                      |      |      |      |      |      |
| Conduct. $\mu$ mhos | 317                  | 373  | 397  | 476  | 610  | 772  |
| D.O. ppm            | 8.2                  | 8.2  | 8.2  | 8.2  | 8.2  | 8.2  |
| pH Std .units       | 8.0                  | 8.1  | 8.1  | 8.2  | 8.3  | 8.3  |
| Temp. °C            | 25.0                 | 25.0 | 25.0 | 25.0 | 25.0 | 25.0 |

## APPENDIX I

### RAW DATA

18 May – 22 May

RESULTS OF TWO ACUTE TOXICITY EVALUATIONS OF  
RUTGERS ORGANICS CORPORATION,  
SALEM SITE LAGOON WATER TREATMENT PLANT  
FINAL EFFLUENT

# Freshwater Acute Test

American Aquatic Testing, Inc.

Job #: 51-01-69

Start Date/Time: 5-18-04 1530

Species: ~~P. promelas~~ C. dubia

End Date/Time: 5-20-04 1600

Dilution Water: EPA Mod. Hard

Test Type: 48hr. SNR

| Conc.<br>% | Temperature (C)         |        |        |
|------------|-------------------------|--------|--------|
|            | 0 hr.                   | 24 hr. | 48 hr. |
| Control    | 25.5                    | 25.5   | 25.0   |
| 10         | 25.5                    | 25.5   | 25.0   |
| 18         | 25.5                    | 25.5   | 25.0   |
| 32         | 25.5                    | 25.5   | 25.0   |
| 56         | 25.5                    | 25.5   | 25.0   |
| 100        | 25.0                    | 25.5   | 25.0   |
| Conc.<br>% | pH (Stand units)        |        |        |
|            | 0 hr.                   |        | 48 hr. |
| Control    | 7.8                     |        | 8.0    |
| 10         | 7.7                     |        | 8.1    |
| 18         | 7.6                     |        | 8.1    |
| 32         | 7.6                     |        | 8.2    |
| 56         | 7.4                     |        | 8.3    |
| 100        | 7.2                     |        | 8.3    |
| Conc.      | Dissolved Oxygen (mg/L) |        |        |
|            | 0 hr.                   |        | 48 hr. |
| Control    | 7.9                     |        | 8.2    |
| 10         | 7.5                     |        | 8.2    |
| 18         | 7.4                     |        | 8.2    |
| 32         | 7.3                     |        | 8.2    |
| 56         | 6.6                     |        | 8.2    |
| 100        | 5.5                     |        | 8.2    |
| Conc.      | Conductivity (umhos)    |        |        |
|            | 0 hr.                   |        | 48 hr. |
| Control    | 290                     |        | 317    |
| 10         | 340                     |        | 373    |
| 18         | 380                     |        | 397    |
| 32         | 450                     |        | 476    |
| 56         | 595                     |        | 610    |
| 100        | 825                     |        | 772    |
| Initials   | JF                      | JF     | JF     |
| Date       | 5/18                    | 5/19   | 5/20   |

| Conc.<br>% | Rep. | Live Count |        |        |
|------------|------|------------|--------|--------|
|            |      | 0 hr.      | 24 hr. | 48 hr. |
| Control    | A    | 5          | 5      | 5      |
|            | B    | 5          | 5      | 5      |
|            | C    | 5          | 5      | 5      |
|            | D    | 5          | 5      | 5      |
| 10         | A    | 5          | 5      | 5      |
|            | B    | 5          | 5      | 5      |
|            | C    | 5          | 5      | 5      |
|            | D    | 5          | 5      | 5      |
| 18         | A    | 5          | 5      | 5      |
|            | B    | 5          | 5      | 4      |
|            | C    | 5          | 5      | 5      |
|            | D    | 5          | 5      | 5      |
| 32         | A    | 5          | 5      | 5      |
|            | B    | 5          | 5      | 5      |
|            | C    | 5          | 5      | 5      |
|            | D    | 5          | 5      | 5      |
| 56         | A    | 5          | 5      | 5      |
|            | B    | 5          | 5      | 5      |
|            | C    | 5          | 5      | 5      |
|            | D    | 5          | 5      | 5      |
| 100        | A    | 5          | 5      | 5      |
|            | B    | 5          | 5      | 5      |
|            | C    | 5          | 4      | 4      |
|            | D    | 5          | 5      | 5      |
| Initials   |      | JF         | JF     | JF     |
| Date       |      | 5/18       | 5/19   | 5/20   |

Observations:

| Conc.    | Alkalinity | Hardness |
|----------|------------|----------|
| Control  | 70         | 80       |
| 100%     | 200        | 370      |
| Initials | JF         | JF       |
| Date     | 5/18       | 5/18     |



# Freshwater Acute Test

American Aquatic Testing, Inc.

Job #: 51-01-69

Start Date/Time: 5-18-04 1640

Species: P. promelas

End Date/Time: 5-22-04 1600

Dilution Water: EPA Mod. Hard

Test Type: 96 hr. SNR Screen

| Concentration | Rep. | Live Count |        |        |        |        | Temperature (C) |        |        |        |        |
|---------------|------|------------|--------|--------|--------|--------|-----------------|--------|--------|--------|--------|
|               |      | 0 hr.      | 24 hr. | 48 hr. | 72 hr. | 96 hr. | 0 hr.           | 24 hr. | 48 hr. | 72 hr. | 96 hr. |
| Control       | A    | 10         | 10     | 10     | 10     | 10     | 25.5            | 26.0   | 25.0   | 26.0   | 25.5   |
|               | B    | 10         | 10     | 10     | 10     | 10     | 25.5            | 26.0   | 25.0   | 26.0   | 25.5   |
| 10%           | A    | 10         | 10     | 10     | 10     | 10     | 25.5            | 26.0   | 25.0   | 26.0   | 25.5   |
|               | B    | 10         | 10     | 10     | 10     | 10     | 25.5            | 26.0   | 25.0   | 26.0   | 25.5   |
| 18%           | A    | 10         | 10     | 10     | 10     | 10     | 25.5            | 26.0   | 25.0   | 26.0   | 25.5   |
|               | B    | 10         | 10     | 10     | 10     | 10     | 25.5            | 26.0   | 25.0   | 26.0   | 25.5   |
| 32%           | A    | 10         | 9      | 9      | 9      | 9      | 25.5            | 26.0   | 25.0   | 26.0   | 25.5   |
|               | B    | 10         | 10     | 10     | 10     | 10     | 25.5            | 26.0   | 25.0   | 26.0   | 25.5   |
| 56%           | A    | 10         | 9      | 9      | 9      | 9      | 25.5            | 26.0   | 25.0   | 26.0   | 25.5   |
|               | B    | 10         | 10     | 10     | 9      | 9      | 25.5            | 26.0   | 25.0   | 26.0   | 25.5   |
| 100%          | A    | 10         | 10     | 10     | 9      | 9      | 25.5            | 26.0   | 25.0   | 26.0   | 25.5   |
|               | B    | 10         | 10     | 10     | 10     | 10     | 25.5            | 26.0   | 25.0   | 26.0   | 25.5   |
| Initials      |      | JF         | JF     | JF     | JF     | JF     | JF              | JF     | JF     | JF     | JF     |
| Date          |      | 5-18       | 5-19   | 5-20   | 5-21   | 5-22   | 5-18            | 5-19   | 5-20   | 5-21   | 5-22   |

| Concentration | pH    |        | D.O. (mg/L) |        | Cond. (umhos) |        |
|---------------|-------|--------|-------------|--------|---------------|--------|
|               | 0 hr. | 96 hr. | 0 hr.       | 96 hr. | 0 hr.         | 96 hr. |
| Control       | 7.8   | 7.9    | 8.3         | 7.0    | 285           | 299    |
| 10%           | 7.8   | 7.9    | 8.0         | 7.0    | 340           | 360    |
| 18%           | 7.7   | 8.0    | 7.8         | 7.0    | 382           | 396    |
| 32%           | 7.6   | 8.1    | 7.6         | 7.1    | 448           | 463    |
| 56%           | 7.4   | 8.3    | 7.1         | 7.0    | 598           | 608    |
| 100%          | 7.3   | 8.3    | 5.6         | 6.8    | 820           | 810    |
| Initials      | JF    | MP     | JF          | MP     | JF            | MP     |
| Date          | 5-18  | 5-22   | 5-18        | 5-22   | 5-18          | 5-22   |

| Concentration | Alkalinity (mg/L) | Hardness (mg/L) |
|---------------|-------------------|-----------------|
| Control       | 70                | 80              |
| 100%          | 200               | 370             |
| Initials      | JF                | JF              |
| Date          | 5-18              | 5-18            |

Observations: ① 349 JF 5-18

890 North Graham St.  
ALLENTOWN, PA 18109  
610 434 9015

Job #: 51-01-69

Client: Rutgers Organics Client Contact: Dennis Lane

Address: Salem, Ohio

Phone #: (330) 332-4834

| Sample | Return to client | [ ] |
|--------|------------------|-----|
|--------|------------------|-----|

**Disposal:** Lab disposal ☒

[illegible]

Samples were:

1. Collected by AAT personnel ☐ Client personnel ☒ 2. Transported on ice? Yes ☐ No ☐ 3. Received within holding time? Yes ☒ No ☐ 4. Sample matrix is: Liquid ☒ Sediment ☐ Soil ☐ Other ☐

### CUSTODY INFORMATION

[illegible]

APPENDIX II

OHIO EPA NPDES BIOMONITORING REPORT FORM

## OHIO EPA NPDES BIOMONITORING REPORT FORM

## GENERAL INFORMATION

1. Facility Name: Rutgers Organics Corporation  
Reporting Date: 06 June 2004
2. Address: 1224 Benton Road  
Salem, Ohio 44460  
Substantive
3. Ohio EPA Permit Number: Discharge Criteria 4. Application (NPDES) No. \_\_\_\_\_
5. Facility Contact: Ralph Pearce 6. Phone No.: (800) 458-3434
7. Consultant/Testing Lab Name: American Aquatic testing, Inc.
8. Consultant/Lab Contact: Chris Nally 9. Phone No.: (610) 434-9015
10. Receiving Water(s) of Discharge: Unnamed Tributary of the Middle Fork of Middle Creek.

11. Outfall(s) Tested: 05/17/04  
001

Average Daily Flows:  
on Day Sampled (gal/day)

12. Is your current Standard Operating Procedure (SOP) Manual on file with Ohio EPA? (Yes/No) No If yes, date submitted: \_\_\_\_\_. If no, an SOP that follows Ohio EPA and/or U.S. EPA protocols must be submitted as soon as possible in order to eliminate the need to include this information with every report.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Tarmo Pallop  
Signature

Tarmo Pallop, Vice - President

6-11-04  
Date

## ACUTE TOXICITY TEST SAMPLING DATA

TABLE

| Sampling Summary for Acute Toxicity Tests |                         |                      |                                     |
|---|-------------------------|----------------------|-------------------------------------|
| Sampling Location & Description           | Sample Collection       |                      | Weather/Receiving Stream Conditions |
|   | Beginning<br>MM/DD/Time | Ending<br>MM/DD/Time |                                     |
| Final Effluent:                           | 05/17/04 1400           | N/A                  |                                     |
| Outfall No.: _____                        | 001                     |                      |                                     |
| Type (Grab/Composite):                    | Grab                    |                      |                                     |
| Volume Collected:                         | 1.0-gallon              |                      |                                     |
| Upstream Station:                         | N/A                     |                      |                                     |
| Waterbody:                                |                         |                      |                                     |
| Station No.:                              |                         |                      |                                     |
| Type (Grab/Composite):                    |                         |                      |                                     |
| Volume Collected:                         |                         |                      |                                     |
| Downstream Station (Near-field):          | N/A                     |                      |                                     |
| Waterbody:                                |                         |                      |                                     |
| Station No.:                              |                         |                      |                                     |
| Type (Grab/Composite):                    |                         |                      |                                     |
| Volume Collected:                         |                         |                      |                                     |
| Additional Stations (If needed):          | N/A                     |                      |                                     |
| Waterbody:                                |                         |                      |                                     |
| Station No.:                              |                         |                      |                                     |
| Type (Grab/Composite):                    |                         |                      |                                     |
| Volume Collected:                         |                         |                      |                                     |
| Waterbody:                                |                         |                      |                                     |
| Station No.:                              |                         |                      |                                     |
| Type (Grab/Composite):                    |                         |                      |                                     |
| Volume Collected:                         |                         |                      |                                     |

TABLE

| Summary of Toxicity Test Conditions   |  |
|---|--|
| 1. Test Species and Age:  | <i>Pimephales promelas</i> - 02 days old |
| 2. Test Type and Duration:  | 96-hour Static Acute                     |
| 3. Test Dates:  | 18 - 22 May 2004                         |
| 4. Test Temperature (°C):   | 25.0°C ± 1.0°C                           |
| 5. Light Quality:   | 50-100 ft. candles                       |
| 6. Photoperiod:   | 16 hours light / 8 hours dark            |
| 7. Feeding Regime:  | None                                     |
| 8. Size of Test Vessel:   | 1000 mL                                  |
| 9. Volume and Depth of Test Solutions:  | 500 mL / 92 mm                           |
| 10. No. of Test Organisms per Test Vessel:  | Ten                                      |
| 11. No. of Test Vessels per Test Solution:  | Two                                      |
| 12. Total No. of Test Organisms per Test Solution:  | 20                                       |
| 13. Test Concentrations (as percent by volume effluent):  | 0, 10, 18, 32, 56, and 100%              |
| 14. Renewal of Test Solutions:  | None                                     |
| 15. Dilution and Primary Control Water:   | Moderately Hard Reconstituted Water      |
| 16. Secondary Control Water:  | N/A                                      |
| 17. Aeration? Before/During Test:   | None                                     |
| 18. Endpoints Measured:   | LC <sub>50</sub> and TU <sub>a</sub>     |
| 19. If secondary control water used as diluent due to toxicity in primary control water, indicate number of consecutive tests conducted with alternative diluent: | N/A                                      |

## ACUTE TOXICITY TEST RESULTS

TABLE

| Results of a <u>Pimephales</u> <u>promelas</u> <u>96</u> -Hour Static Acute Toxicity Test<br>(genus) (species)         |  |                              |                              |                              |  |                                   |                                   |                                   |
|--|--|------------------------------|------------------------------|------------------------------|--|-----------------------------------|-----------------------------------|-----------------------------------|
| Conducted <u>05/18/04</u> - <u>05/22/04</u> Using Effluent from Outfall <u>001</u> .<br>(mm/dd/yy) (mm/dd/yy) (number) |  |                              |                              |                              |  |                                   |                                   |                                   |
| Test Solutions   | Cumulative Percent Mortality<br>(Cumulative Percent Affected) <sup>a</sup> |                              |                              |                              | LC <sub>50</sub> Values<br>(EC <sub>50</sub> Values)   |                                   |                                   |                                   |
|  | 24-Hr  | 48-Hr                        | 72-Hr                        | 96-Hr                        | 24-Hr  | 48-Hr                             | 72-Hr                             | 96-Hr                             |
| Primary Control/<br>Dilution Water   | <u>0</u><br>( <u>0</u> )   | <u>0</u><br>( <u>0</u> )     | <u>0</u><br>( <u>0</u> )     | <u>0</u><br>( <u>0</u> )     | <u>&gt;100%</u><br>( <u>N/A</u> )  | <u>&gt;100%</u><br>( <u>N/A</u> ) | <u>&gt;100%</u><br>( <u>N/A</u> ) | <u>&gt;100%</u><br>( <u>N/A</u> ) |
| Secondary<br>Control   | <u>N/A</u><br>( <u>   </u> )   | <u>   </u><br>( <u>   </u> ) | <u>   </u><br>( <u>   </u> ) | <u>   </u><br>( <u>   </u> ) | LC <sub>50</sub> 95% Confidence Limits<br>(EC <sub>50</sub> 95% Confidence Limits)   |                                   |                                   |                                   |
| <u>10 %</u> Effluent   | <u>0</u><br>( <u>0</u> )   | <u>0</u><br>( <u>0</u> )     | <u>0</u><br>( <u>0</u> )     | <u>0</u><br>( <u>0</u> )     | 24-Hr  | 48-Hr                             | 72-Hr                             | 96-Hr                             |
| <u>18 %</u> Effluent   | <u>0</u><br>( <u>0</u> )   | <u>0</u><br>( <u>0</u> )     | <u>0</u><br>( <u>0</u> )     | <u>0</u><br>( <u>0</u> )     | LL <u>N/A</u>  | <u>N/A</u>                        | <u>N/A</u>                        | <u>N/A</u>                        |
| <u>32 %</u> Effluent   | <u>1</u><br>( <u>5</u> )   | <u>1</u><br>( <u>5</u> )     | <u>1</u><br>( <u>5</u> )     | <u>1</u><br>( <u>5</u> )     | UL <u>N/A</u>  | <u>N/A</u>                        | <u>N/A</u>                        | <u>N/A</u>                        |
| <u>56 %</u> Effluent   | <u>1</u><br>( <u>5</u> )   | <u>1</u><br>( <u>5</u> )     | <u>2</u><br>( <u>10</u> )    | <u>2</u><br>( <u>10</u> )    | LL ( <u>N/A</u> )  | ( <u>   </u> )                    | ( <u>   </u> )                    | ( <u>   </u> )                    |
| <u>100 %</u> Effluent  | <u>0</u><br>( <u>0</u> )   | <u>0</u><br>( <u>0</u> )     | <u>1</u><br>( <u>5</u> )     | <u>1</u><br>( <u>5</u> )     | UL ( <u>N/A</u> )  | ( <u>   </u> )                    | ( <u>   </u> )                    | ( <u>   </u> )                    |
| Near-Field<br>Sample   | <u>N/A</u><br>( <u>   </u> )   | <u>   </u><br>( <u>   </u> ) | <u>   </u><br>( <u>   </u> ) | <u>   </u><br>( <u>   </u> ) | LL = Lower Limit<br>UL = Upper Limit   |                                   |                                   |                                   |
|  |  |                              |                              |                              | Calculated TU <sub>a</sub> Value: <u>1.0</u>   |                                   |                                   |                                   |
|  |  |                              |                              |                              | Method(s) Used to Determine LC <sub>50</sub> ,<br>EC <sub>50</sub> , and Confidence Limit Values:<br><br>Visual Inspection |                                   |                                   |                                   |

<sup>a</sup>-cumulative percent affected is the total percentage of test organisms observed dead, immotile, exhibiting loss of equilibrium, or other defined endpoints (specify below):  
\_\_\_\_\_

## TOXICITY TEST CONDITIONS

TABLE

| Summary of Toxicity Test Conditions   |   |
|---|---|
| 1. Test Species and Age:  | <i>Ceriodaphnia dubia</i> - <24-hours old |
| 2. Test Type and Duration:  | 48-hour Static Acute                      |
| 3. Test Dates:  | 18 - 20 May 2004                          |
| 4. Test Temperature (°C):   | 25.0°C ± 1°C                              |
| 5. Light Quality:   | 50-100 ft candles                         |
| 6. Photoperiod:   | 16 hours light / 8 hours dark             |
| 7. Feeding Regime:  | None                                      |
| 8. Size of Test Vessel:   | 30 mL                                     |
| 9. Volume and Depth of Test Solutions:  | 25 mL / 25 mm                             |
| 10. No. of Test Organisms per Test Vessel:  | Five                                      |
| 11. No. of Test Vessels per Test Solution:  | Four                                      |
| 12. Total No. of Test Organisms per Test Solution:  | 20  |
| 13. Test Concentrations (as percent by volume effluent):  | 0, 10, 18, 32, 56, and 100%               |
| 14. Renewal of Test Solutions:  | None                                      |
| 15. Dilution and Primary Control Water:   | Moderately Hard Reconstituted Water       |
| 16. Secondary Control Water:  | N/A                                       |
| 17. Aeration? Before/During Test:   | None                                      |
| 18. Endpoints Measured:   | LC <sub>50</sub> and TU <sub>a</sub>      |
| 19. If secondary control water used as diluent due to toxicity in primary control water, indicate number of consecutive tests conducted with alternative diluent: | N/A                                       |



## ACUTE TOXICITY TEST RESULTS

TABLE

| Results of a <u>Ceriodaphnia</u> <u>dubia</u> <u>48</u> -Hour Static Acute Toxicity Test<br>(genus) (species)        |  |                          |       |       |  |                                   |       |       |
|--|--|--------------------------|-------|-------|--|-----------------------------------|-------|-------|
| Conducted <u>05/18/04</u> - <u>05/20/04</u> Using Effluent from Outfall <u>001</u><br>(mm/dd/yy) (mm/dd/yy) (number) |  |                          |       |       |  |                                   |       |       |
| Test Solutions   | Cumulative Percent Mortality<br>(Cumulative Percent Affected) <sup>a</sup> |                          |       |       | LC <sub>50</sub> Values<br>(EC <sub>50</sub> Values)   |                                   |       |       |
|  | 24-Hr  | 48-Hr                    | 72-Hr | 96-Hr | 24-Hr  | 48-Hr                             | 72-Hr | 96-Hr |
| Primary Control/<br>Dilution Water   | <u>0</u><br>( <u>0</u> )   | <u>0</u><br>( <u>0</u> ) | ( )   | ( )   | <u>&gt;100%</u><br>( <u>N/A</u> )  | <u>&gt;100%</u><br>( <u>N/A</u> ) | ( )   | ( )   |
| Secondary<br>Control   | <u>N/A</u><br>( )  | ( )                      | ( )   | ( )   | LC <sub>50</sub> 95% Confidence Limits<br>(EC <sub>50</sub> 95% Confidence Limits)   |                                   |       |       |
| <u>10</u> % Effluent   | <u>0</u><br>( <u>0</u> )   | <u>0</u><br>( <u>0</u> ) | ( )   | ( )   | 24-Hr  | 48-Hr                             | 72-Hr | 96-Hr |
| <u>18</u> % Effluent   | <u>0</u><br>( <u>0</u> )   | <u>1</u><br>( <u>5</u> ) | ( )   | ( )   | LL <u>N/A</u>  | <u>N/A</u>                        |       |       |
| <u>32</u> % Effluent   | <u>0</u><br>( <u>0</u> )   | <u>0</u><br>( <u>0</u> ) | ( )   | ( )   | UL <u>N/A</u>  | <u>N/A</u>                        |       |       |
| <u>56</u> % Effluent   | <u>0</u><br>( <u>0</u> )   | <u>0</u><br>( <u>0</u> ) | ( )   | ( )   | LL ( <u>N/A</u> )  | ( <u>N/A</u> )                    | ( )   | ( )   |
| <u>100</u> % Effluent  | <u>1</u><br>( <u>5</u> )   | <u>1</u><br>( <u>5</u> ) | ( )   | ( )   | UL ( <u>N/A</u> )  | ( <u>N/A</u> )                    | ( )   | ( )   |
| Near-Field<br>Sample   | <u>N/A</u><br>( )  | ( )                      | ( )   | ( )   | LL = Lower Limit<br>UL = Upper Limit   |                                   |       |       |
|  |  |                          |       |       | Calculated TU <sub>a</sub> Value: <u>1.0</u>   |                                   |       |       |
|  |  |                          |       |       | Method(s) Used to Determine LC <sub>50</sub> ,<br>EC <sub>50</sub> , and Confidence Limit Values:<br><br>Visual Inspection |                                   |       |       |

<sup>a</sup>-cumulative percent affected is the total percentage of test organisms observed dead, immotile, exhibiting loss of equilibrium, or other defined endpoints (specify below):  
\_\_\_\_\_